

**Hearing Date and Time: January 18, 2024 at 10:00 A.M. (ET)**  
**Objection Deadline: January 9, 2024 at 4:00 P.M. (ET)**

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**THIS OBJECTION SEEKS TO DISALLOW AND  
EXPUNGE CERTAIN FILED PROOFS OF CLAIM**

**PLEASE CAREFULLY REVIEW THE  
ATTACHED OBJECTION AND THE ATTACHMENTS  
THERE TO TO DETERMINE WHETHER IT AFFECTS YOUR CLAIM(S)**

**IF YOU HAVE ANY QUESTIONS, PLEASE CONTACT DEBTORS' COUNSEL:  
DEANDRA FIKE, ESQ., [DFIKE@CGSH.COM](mailto:DFIKE@CGSH.COM) OR KATHARINE ROSS, ESQ.,  
[KROSS@CGSH.COM](mailto:KROSS@CGSH.COM)**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

Genesis Global Holdco, LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No.: 23-10063 (SHL)

Jointly Administered

**NOTICE OF HEARING ON DEBTORS'  
FIFTEENTH OMNIBUS OBJECTION (NON-SUBSTANTIVE)**

<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's tax identification number as applicable), are: Genesis Global Holdco, LLC (8219); Genesis Global Capital, LLC (8564); Genesis Asia Pacific Pte. Ltd. (2164R). For the purpose of these Chapter 11 Cases, the service address for the Debtors is 175 Greenwich Street, Floor 38, New York, NY 10007.

**TO CERTAIN CLAIMS PURSUANT TO 11 U.S.C. § 502  
AND FED. R. BANKR. P. 3007 (DUPLICATE)**

**PLEASE TAKE NOTICE** that on January 19, 2023 (the “Petition Date”), Genesis Global Holdco, LLC (“Holdco”) and its debtor affiliates, as debtors and debtors-in-possession in the above-captioned chapter 11 cases (collectively, the “Debtors”),<sup>2</sup> each filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* (the “Bankruptcy Code”) with the United States Bankruptcy Court for the Southern District of New York (the “Court”).

**PLEASE TAKE FURTHER NOTICE** that on December 19, 2023 the Debtors filed the *Debtors’ Fifteenth Omnibus Objection (Non-Substantive) to Certain Claims Pursuant to 11 U.S.C. § 502 and Fed. R. Bankr. P. 3007 (Duplicate)* (the “Fifteenth Omnibus Objection”). A hearing (the “Hearing”) on the Fifteenth Omnibus Objection will be held before the Honorable Sean H. Lane, United States Bankruptcy Judge in the United States Bankruptcy Court for the Southern District of New York, 300 Quarropas Street, White Plains, NY 10610 pursuant to the *Order Implementing Certain Notice and Case Management Procedures* (ECF No. 44) (the “Case Management Order”) and to the *Order Pursuant to 11 U.S.C. § 105(a) and Fed. R. Bankr. P. 3007 (I) Establishing Claims Objection and Notice Procedures, (II) Establishing Claim Hearing Procedures and (III) Granting Related Relief* (ECF No. 498) (the “Claims Procedures Order”). The Hearing will commence on **January 18, 2024, at 10:00 A.M. (Prevailing Eastern Time)**, and will be conducted through zoom for government. Pursuant to the Claims Procedures Order, the Debtors reserve the right to adjourn the Hearing in their sole discretion on further notice. *See* Claims Procedures Order ¶ 3.

**PLEASE TAKE FURTHER NOTICE** that parties wishing to register for the Zoom hearing should use the eCourt Appearances link on the Court’s website: <https://www.nysb.uscourts.gov/ecourt-appearances>. After the deadline to make appearances passes, the Court will circulate by email prior to the Hearing the Zoom links to those persons who made eCourt Appearances, using the email addresses submitted with those appearances. Members of the public who wish to listen to, but not participate in, the Hearing free of charge may do so by calling the following muted, listen-only number: 1-929-205-6099, Access Code: 92353761344#.

**PLEASE TAKE FURTHER NOTICE** that any objections or responses (“Responses”), if any, to the Fifteenth Omnibus Objection or the relief requested therein shall be made in writing, filed with the Court no later than **January 9, 2024 at 4:00 P.M. (Prevailing Eastern Time)** (the “Response Deadline”), and served as required by the Case Management Order.

**PLEASE TAKE FURTHER NOTICE** that if no Responses are timely filed and served with respect to the Fifteenth Omnibus Objection, the Debtors may, on or after the Response Deadline, submit to the Bankruptcy Court an order substantially in the form annexed as **Exhibit A** to the Fifteenth Omnibus Objection, which order the Court may enter with no further notice or opportunity to be heard.

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<sup>2</sup> Holdco, and its Debtor and non-Debtor subsidiaries are collectively referred to as the “Company”.

**PLEASE TAKE FURTHER NOTICE** copies of the Fifteenth Omnibus Objection can be viewed and/or obtained by: (i) accessing the Court's website at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov), or (ii) from the Debtors' notice and claims agent, Kroll Restructuring Administration located at One Grand Central Place, 60 East 42<sup>nd</sup> Street, Suite 1440, New York, New York 10165, at <https://restructuring.ra.kroll.com/genesis> or by calling +1 212 257 5450. Note that a PACER password is needed to access documents on the Court's website.

**PLEASE TAKE FURTHER NOTICE** that the Hearing may affect your rights. Please read the Fifteenth Omnibus Objection carefully and, if you have one available, discuss it with your attorney. (If you do not have an attorney, you should consider consulting with one.)

**PLEASE TAKE FURTHER NOTICE** that if you oppose the relief requested in the Fifteenth Omnibus Objection, or if you want the Court to hear your position on the Fifteenth Omnibus Objection, then you or your attorney must attend the Hearing. If you or your attorney do not follow the foregoing steps, the Court may decide that you do not oppose the relief requested in the Fifteenth Omnibus Objection and may enter orders granting the relief requested by the Debtors.

Dated: December 19, 2023  
New York, New York

/s/ Luke A. Barefoot  
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*Counsel to the Debtors  
and Debtors-in-Possession*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

Genesis Global Holdco, LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No.: 23-10063 (SHL)

Jointly Administered

**DEBTORS' FIFTEENTH OMNIBUS OBJECTION  
(NON-SUBSTANTIVE) TO CERTAIN CLAIMS PURSUANT  
TO 11 U.S.C. § 502 AND FED. R. BANKR. P. 3007 (DUPLICATE)**

**TO THE CLAIMANTS WHOSE CLAIMS ARE OBJECTED TO BY THIS  
OBJECTION (THE "FIFTEENTH OMNIBUS OBJECTION" OR "OBJECTION"):**

- **THIS OBJECTION SEEKS TO DISALLOW AND EXPUNGE CERTAIN  
FILED PROOFS OF CLAIM.**
- **YOU SHOULD LOCATE YOUR CLAIM(S) ON EXHIBIT 1 TO THE  
PROPOSED ORDER.**
- **YOUR RIGHTS MAY BE AFFECTED BY THIS OBJECTION AND ANY  
FURTHER OBJECTION(S) THAT MAY BE FILED BY THE DEBTORS.**

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<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's tax identification number as applicable), are: Genesis Global Holdco, LLC (8219); Genesis Global Capital, LLC (8564); Genesis Asia Pacific Pte. Ltd. (2164R). For the purpose of these Chapter 11 Cases, the service address for the Debtors is 175 Greenwich Street, Floor 38, New York, NY 10007.

**YOUR CLAIM(S) MAY BE DISALLOWED, EXPUNGED, RECLASSIFIED, REDUCED, OR OTHERWISE AFFECTED AS A RESULT OF THIS OBJECTION. THEREFORE, PLEASE READ THIS OBJECTION CAREFULLY AND DISCUSS IT WITH YOUR ATTORNEY. IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT ONE.**

- **THE RELIEF SOUGHT HEREIN IS WITHOUT PREJUDICE TO THE DEBTORS' RIGHTS, CONSISTENT WITH PRIOR COURT ORDERS, TO PURSUE FURTHER SUBSTANTIVE OR NON-SUBSTANTIVE OBJECTIONS AGAINST THE CLAIMS SUBJECT TO THIS OBJECTION.**

Genesis Global Holdco, LLC ("Holdco") and its affiliated debtors and debtors in possession in the above-captioned cases (collectively, the "Debtors," and these cases, the "Chapter 11 Cases") hereby object to and incorporate by reference those claims listed on Exhibit 1 (the "Disputed Claims") to the proposed order, substantially in the form attached hereto as Exhibit A (the "Proposed Order"), pursuant to section 502 of title 11 of the United States Code (the "Bankruptcy Code"), Rule 3007 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and the *Revised Order Pursuant to 11 U.S.C. § 105(a) and Fed. R. Bankr. P. 3007 (I) Establishing Claims Objection and Notice Procedures, (II) Establishing Claim Hearing Procedures and (III) Granting Related Relief* (ECF No. 498) (the "Claims Objection Procedures Order") and seek entry of the Proposed Order disallowing and expunging the Disputed Claims, provided, however, that the liabilities asserted in such claims will survive at the amount asserted in, and for purposes of, the master claim filed by Gemini Trust Company, LLC ("Gemini," and the master claim filed by Gemini, the "Gemini Master Claim") on behalf of the Gemini Lenders (as defined below). In support of this Objection, the Debtors submit the *Declaration of Paul Kinealy in Support of the Debtors' Fifteenth Omnibus Objection (Non-Substantive) to Certain Claims Pursuant to 11 U.S.C. § 502 and Fed. R. Bankr. P. 3007 (Duplicate)* (the "Kinealy Declaration"), attached hereto as Exhibit B and incorporated by reference, and respectfully state as follows:

## **INTRODUCTION**<sup>2</sup>

1. The Debtors, with the aid of their advisors, have identified proofs of claim filed by individual Gemini Lenders that, based upon all relevant information, are duplicative of the Gemini Master Claim filed by Gemini on behalf of the Gemini Lenders pursuant to the authority granted by this Court. Specifically, the Debtors and/or their advisors have reviewed the Disputed Claims and believe them to be duplicates of the Gemini Master Claim based on one or more of the following factors:

- (a) The claimant, upon filing the Disputed Claim, indicated that they were Gemini Lenders by answering “yes” to either of the following two questions on the proof of claim form:
  - (i) Are you a current or former Gemini Trust Company, LLC user?
  - (ii) If yes, is your claim related to any loans you made through the Gemini Earn Program?
- (b) The support provided in the applicable proof of claim indicates that the basis of the Disputed Claim is the Gemini Earn Program (as defined below).
- (c) Through informal exchanges of information between the Debtors and Gemini, Gemini has indicated that the Disputed Claim is included as part of the Gemini Master Claim.

2. In order to avoid double recovery for the same alleged liability, the Debtors move to expunge and disallow the Disputed Claims. For the avoidance of doubt, the same liability

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<sup>2</sup> All capitalized terms in this Introduction shall have the meaning ascribed to them elsewhere in the Objection.

asserted in the Disputed Claims will survive through the Gemini Master Claim, subject to further reconciliation and/or objection.<sup>3</sup>

### **JURISDICTION AND VENUE**

3. The United States Bankruptcy Court for the Southern District of New York (the “Court”) has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the Southern District of New York dated January 31, 2012 (Preska, C.J.). Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b). The statutory bases for the relief requested herein are Bankruptcy Code sections 105 and 502, and Bankruptcy Rule 3007.

### **BACKGROUND**

#### **A. Debtors’ Business and Procedural History**

4. Holdco (together with the other Debtors and Holdco’s non-Debtor subsidiaries, the “Company”) and its non-Debtor affiliate Genesis Global Trading, Inc. (“GGT”) provide lending and borrowing, spot trading, derivatives and custody services for digital assets and fiat currency. The Debtors engage in lending, borrowing and certain trading services, while the non-Debtor subsidiaries engage in derivatives, custody and most of the Company’s trading services. Holdco is a sister company of GGT and 100% owned by Digital Currency Group, Inc. Additional information regarding the Debtors’ business, capital structure and the circumstances leading to the commencement of the Chapter 11 Cases is set forth in the *Declaration of A. Derar Islim in Support*

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<sup>3</sup> The Debtors have served on Gemini requests for discovery regarding, among other things, the identity of each Gemini Lender and the components of each of their Gemini Borrowings (as defined below), including currency or asset type and amount, that comprise the Gemini Master Claim and intend to revise the Proposed Order and Exhibit 1 attached hereto to reflect any changes necessitated by the results of such discovery prior to the hearing on this Objection.

*of First Day Motions and in Compliance with Local Rule 1007-2* (ECF No. 17), the *Declaration of Paul Aronzon in Support of First Day Motions and Applications in Compliance with Local Rule 1007-2* (ECF No. 19) and the *Declaration of Michael Leto in Support of First Day Motions and Applications in Compliance with Local Rule 1007-2* (ECF No. 28) (together, the “First Day Declarations”).<sup>4</sup>

5. On January 19, 2023, the Debtors each filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code (the date of such filing, the “Petition Date”) with the Court. The Debtors continue to operate their businesses and manage their properties as debtors in possession under sections 1107(a) and 1108 of the Bankruptcy Code. The Chapter 11 Cases are jointly administered for procedural purposes only pursuant to Bankruptcy Rule 1015(b) and the *Order Directing Joint Administration of the Related Chapter 11 Cases* (ECF No. 37). No trustee or examiner has been appointed in the Chapter 11 Cases. On February 3, 2023, an official committee of unsecured creditors (the “Committee”) was appointed in the Chapter 11 Cases pursuant to the *Notice of Appointment of Official Committee of Unsecured Creditors* (ECF No. 55).

6. On March 21, 2023, each Debtor filed its *Summary of Assets and Liabilities* (ECF Nos. 145, 146, and 147) and *Statement of Financial Affairs* (ECF Nos. 142, 143 (as amended by ECF No. 450), and 144) (the “Schedules” and “Statements,” respectively).

7. On April 4, 2023, the Court granted the *Order (I) Establishing Bar Dates for Submitting Proofs of Claim, (II) Approving Proof of Claim Form, Bar Date Notices, and Mailing and Publication Procedures, (III) Implementing Uniform Procedures Regarding 503(b)(9) Claims*

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<sup>4</sup>. Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the First Day Declarations.



*and (IV) Providing Certain Supplemental Relief* (ECF No. 200) (the “Bar Date Order”), which established May 22, 2023 as the general date by which most creditors have submitted their proofs of claim (the “General Bar Date”).

**B. Relationship Between the Debtors and Gemini**

8. Prior to the Petition Date, Debtor Genesis Global Capital, LLC (“GGC”) engaged in borrowing activities with Gemini for the ultimate benefit of certain Gemini users that elected to provide loans to GGC through an investment program (the “Gemini Earn Program”). Through the Gemini Earn Program, a subset of Gemini’s users (each a “Gemini Lender”) agreed to lend certain of their digital assets custodied on Gemini’s cryptocurrency platform to GGC (the “Gemini Borrowings”) in exchange for the return of such digital assets upon request or at the expiration of a specified period and the payment by GGC of a loan fee. Under the terms of the relevant master loan agreements (“Gemini MLAs”) between GGC, Gemini and each Gemini Lender, the Gemini Lenders appointed Gemini to act as agent in connection with the Gemini Borrowings. In turn, GGC received and paid interest on the Gemini Lenders’ assets and lent the assets to institutional borrowers.

9. Given the nature of the Gemini Borrowings and Gemini’s appointment as agent for each Gemini Lender under the Gemini MLAs, the Bar Date Order authorized and directed Gemini to file a master claim on behalf of each of the Gemini Lenders pursuant to section 501(a) of the Bankruptcy Code against GGC and/or any other Debtor that Gemini determined may have liability to the Gemini Lenders for repayment of the Gemini Borrowings. *See* Bar Date Order ¶ 7. Gemini timely filed three (3) such claims on behalf of all Gemini Lenders, based on Gemini’s review of its books and records. *See* Claim Nos. 356, 369, and 400. The Debtors herein refer to Gemini’s claim against GGC, Claim No. 356, as the Gemini Master Claim.

10. The Bar Date Order also approved the proof of claim form for use in these Chapter 11 Cases (attached as Exhibit A to the Bar Date Order), which included as question 8 (“Question 8”) the following inquiries for each potential claimant to answer:

- (a) What is the basis of the claim?
- (b) Are you a current or former Gemini Trust Company, LLC user?
- (c) If yes, is your claim related to any loans you made through the Gemini Earn Program?

See Bar Date Order, Exhibit A at 3.

11. The General Bar Date passed on May 22, 2023. As of December 17, 2023, 1,248 proofs of claim have been filed against the Debtors.

### **C. The Claims Resolution Process**

12. In the ordinary course of business, the Debtors maintain books and records (the “Books and Records”) that reflect, among other things, the Debtors’ liabilities and the amounts owed to their creditors.

13. The Debtors’ Claims agent, Kroll Restructuring Administration (the “Claims Agent”), has prepared and maintains a register (the “Claims Register”) of proofs of claim (each a “Proof of Claim”) that were filed in these Chapter 11 Cases asserting claims against the Debtors (collectively, the “Claims,” and each holder of a Claim, a “Claimant”). Pursuant to the *Stipulation and Confidentiality Agreement and Protective Order* (ECF No. 238) (the “Protective Order”), much of that information is maintained under seal to protect the confidentiality of the Debtors’ creditors. The Debtors and their advisors are comprehensively reviewing and reconciling all claims, including both the claims listed on the Schedules (“Scheduled Claims”) and the Claims asserted in the Proofs of Claim (including any supporting documents). The Debtors are also

comparing the Claims asserted in the Proofs of Claim with their Books and Records to determine the validity of the asserted Claims.

14. The reconciliation process includes identifying particular categories of claims that may be targeted for disallowance, reduction and allowance or reclassification and allowance. To reduce the number of Claims, and to avoid possible double recovery or otherwise improper recovery by Claimants, as well as unnecessary duplication or noise in the voting pool in respect of the Debtors' upcoming solicitation, the Debtors will continue to file omnibus objections to such categories of claims if and where warranted. This Objection is one such omnibus objection.

15. The Debtors and/or their advisors reviewed the Claims Register, the Schedules, the Debtors' Books and Records, the Gemini Master Claim and each of the Disputed Claims and identified the Disputed Claims as individual claims filed by Gemini Lenders (the "Gemini Claimants") and each a "Gemini Claimant") that participated in the Gemini Earn Program and whose claims are therefore duplicative of the Gemini Master Claim. *See* Ex. B, Kinealy Decl. ¶¶ 5–6. The Debtors and/or their advisors made such a conclusion based on one or more of the following factors:

- (a) The Claimant, upon filing the Disputed Claim indicated that they were Gemini Lenders by answering "yes" to either of the following two questions on the proof of claim form:
  - (i) Are you a current or former Gemini Trust Company, LLC user?
  - (ii) If yes, is your claim related to any loans you made through the Gemini Earn Program?
- (b) Through informal exchanges of information between the Debtors and Gemini, Gemini has indicated that the Disputed Claim is included as part of the Gemini Master Claim.

- (c) The support provided for the Disputed Claim indicates that the basis of the Disputed Claim is the Gemini Earn Program (as defined below).

16. On July 12, 2023, the Court entered the Claims Objection Procedures Order granting the Debtors relief from certain requirements of Bankruptcy Rule 3007. The Debtors submit that this Objection and the notice provided to the Gemini Claimants in connection herewith are consistent with the Claims Objection Procedures Order, the Bankruptcy Code and the Bankruptcy Rules.

### **RELIEF REQUESTED**

17. For the reasons set forth below, the Debtors object to each of the Disputed Claims. By this Objection, the Debtors respectfully request that the Court enter the Proposed Order pursuant to section 502(b) of the Bankruptcy Code and Bankruptcy Rule 3007 disallowing in full each of the Disputed Claims, with the surviving Gemini Master Claim to remain, subject to further reconciliation and/or objection.

18. The Debtors and/or their advisors have reviewed the Claims Register, the Schedules, the Debtors' Books and Records, the Gemini Master Claim and each of the Disputed Claims. Based on this review, the Debtors have determined that each of the Disputed Claims identified in Exhibit 1 to the Proposed Order are claims asserted by Gemini Lenders and therefore are duplicates of the Gemini Master Claim. If the Disputed Claims are not disallowed, the Gemini Claimants may obtain double recovery for the same alleged liability already asserted by the Gemini Master Claim. By this Objection, the Debtors seek disallowance of each of the Disputed Claims in order to limit each Gemini Claimant to a single claim against the relevant Debtor's estate (*i.e.*, the Gemini Master Claim).<sup>5</sup>

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<sup>5</sup> Further, the Disputed Claims marked with an asterisk on Exhibit 1 to the Proposed Order were filed after the General Bar Date. Pursuant to section 502(b) of the Bankruptcy Code, a claimant's failure to timely file a proof of

19. For each of the Disputed Claims, the Debtors have identified the surviving Gemini Master Claim. The Gemini Master Claim will be unaffected by the relief requested in this Objection (subject to the Debtors' right to assert additional objections and defenses to the allowance of each Gemini Master Claim) and each Gemini Claimant's right to assert these liabilities against the Debtors' estates will be preserved through the Gemini Master Claim, subject to the Debtors' reservations of their rights to object to the Gemini Master Claim and other claims on all grounds, whether legal, factual, procedural, substantive or non-substantive. Accordingly, each of the Disputed Claims should be disallowed in full.

### **BASIS FOR RELIEF**

20. When asserting a proof of claim against a bankruptcy estate, a claimant must allege facts that, if true, would support a finding that the debtor is legally liable to the claimant. *See In re Avaya, Inc.*, 608 B.R. 366, 369-70 (Bankr. S.D.N.Y. 2019). Where the claimant alleges sufficient facts to support its claim, its claim is afforded prima facie validity. *See id.* A party wishing to dispute such claim must produce evidence in sufficient force to negate the claim's prima facie validity. *Id.* Once the objecting party produces such evidence, the burden shifts back to the claimant to prove the validity of his or her claim by a preponderance of the evidence. *Id.* The burden of persuasion is always on the claimant. *Id.*

21. Section 502(b)(1) of the Bankruptcy Code provides that a claim may not be allowed to the extent that "such claim is unenforceable against the debtor and property of the debtor, under

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claim provides a basis for disallowance of that claim. *See* 11 U.S.C. § 502(b). Bankruptcy Rule 3007 also expressly allows a debtor to file an omnibus objection to claims on the basis that "they were not timely filed." *See* Fed. R. Bankr. Pro. 3007. To the extent that the Disputed Claims were filed after the General Bar Date, such Claims are untimely and should also be disallowed and expunged on that basis. *See, e.g., In re Roman Catholic Diocese of Rockville Centre, N.Y.*, Case No. 20-12345 (MG), 2023 WL 4497418, at \*12 (Bankr. S.D.N.Y. July 1, 2023) (disallowing late-filed claims); *In re Ditech Holding Corp.*, Case No. 19-10412 (JLG), 2023 WL 3265089, at \*15 (Bankr. S.D.N.Y. May 4, 2023) (same).

any agreement or applicable law.” 11 U.S.C. § 502(b)(1). Bankruptcy Rule 3007(d) and the Claims Objection Procedures Order permit the Debtors to file an objection to more than one claim on non-substantive bases, such as because such claims “duplicate other claims.” *See* Fed. R. Bankr. P. 3007(d)(1).

22. Pursuant to Bankruptcy Rule 3007(d)(1), the Debtors are permitted to file an omnibus objection to Claims to the extent that they are duplicative of other Claims. The Debtors cannot be required to pay the same Claim multiple times. *See, e.g., Phelan v. Local 305 of United Ass’n of Journeymen & Apprentices of Plumbing and Pipefitting Indus. of U.S. & Can.*, 973 F.2d 1050, 1063 (2d Cir. 1992) (articulating the general principal that “[a] plaintiff may not recover twice for the same injury”). Other courts in this district have routinely disallowed and expunged similar claims filed against the same debtor that are duplicates of other claims. *See, e.g.* Order, *In re LATAM Airlines Grp. S.A.*, No. 20-11254 (JLG) (Bankr. S.D.N.Y. May 5, 2021) (ECF No. 2308) (disallowing duplicate bond claims); Order, *In re Celsius Network LLC*, Case No. 22-10964 (MG) (Bankr. S.D.N.Y. Mar. 21, 2023) (ECF No. 2288) (disallowing and expunging duplicate claims); Order, *In re Grupo Aeroméxico, S.A.B. de C.V.*, Case No. 20-11563 (SCC) (Bankr. S.D.N.Y. May 19, 2021) (ECF No. 1208) (same); Order, *In re Avianca Holdings S.A.*, Case No. 20-11133 (MG) (Bankr. S.D.N.Y. Jul. 26, 2021) (ECF No. 1936) (disallowing and expunging claims duplicative of the master proof of claim filed by an indenture trustee on claimants’ behalf); *In re Sears Holdings Corp.*, Case No. 18-23538 (RDD) (Bankr. S.D.N.Y. July 9, 2020) (ECF No. 8278) (disallowing and expunging duplicative claims); *In re The Great Atl. & Pac. Tea Co., Inc.*, Case No. 15-23007 (RDD) (Bankr. S.D.N.Y. Aug. 26, 2016) (ECF No. 3135) (same).

### **OBJECTION**

23. The Debtors object to the Disputed Claims identified in Exhibit 1 to the Proposed Order and respectfully request that they be disallowed in full on the grounds that they are duplicates

of the Gemini Master Claim. For each Duplicate Claim, Exhibit 1 to the Proposed Order indicates the Proof of Claim number under which the Claimant will maintain a Claim upon expungement of the corresponding Duplicate Claim.

24. The Debtors and/or their advisors have reviewed the Claims Register, the Schedules, the Debtors' Books and Records, the Gemini Master Claim and each of the Disputed Claims. *See* Ex. B, Kinealy Decl. at ¶ 4. In addition, the Debtors and/or their advisors have reviewed information informally provided by Gemini confirming that certain of the Disputed Claims were filed by Gemini Earn Users, based on Gemini's review of their own books and records. *See* Ex. B, Kinealy Decl. at ¶ 5. Using these records, the Debtors have determined, with the help of Alvarez and Marsal North America LLC ("A&M"), the Debtors' financial advisor, that the Disputed Claims were filed by Gemini Lenders based on their participation in the Gemini Earn Program. *See* Ex. B, Kinealy Decl. at ¶ 8. The Gemini Master Claim will be unaffected by the relief requested in this Objection (subject to the Debtors' right to assert additional objections and defenses to the allowance of such claim) and each Gemini Claimant's right to assert these liabilities against the Debtors' estates will be preserved, subject to the Debtors' reservations of their rights to object to the Gemini Master Claim and other claims on all grounds, whether legal, factual, procedural, substantive or non-substantive.

25. If the Disputed Claims are not disallowed, the Gemini Claimants may obtain double recovery for the same alleged liability. By this Objection, the Debtors seek disallowance of the Disputed Claims in order to limit each Gemini Claimant to a single claim against a Debtor entity's estate arising from the same alleged liability, ensure that the Claims Register is accurate and does not overstate the Debtors' liabilities and avoid the possibility of multiple recoveries against the Debtors' estates. If any Gemini Claimant believes, contrary to the Debtors' determination, that its

Claim is non-duplicative, it must present affirmative evidence demonstrating the validity of such Claim. *See In re Avaya, Inc.*, 608 B.R. 366, 369-70 (Bankr. S.D.N.Y. 2019). In the absence of such evidence, the Debtors respectfully request entry of the Proposed Order disallowing and expunging the Disputed Claims.

26. For the reasons set forth above, the Disputed Claims addressed in this Objection do not meet the standards for prima facie validity and if the Disputed Claims are not disallowed, the Gemini Claimants subject to this Objection may obtain impermissible or unwarranted recoveries against the Debtors' estates to the detriment of other similarly situated creditors. By this Objection, the Debtors request that the Court disallow and expunge the Disputed Claims in their entirety.

27. Additionally, the Debtors have served on Gemini requests for discovery regarding, among other things, the identity of each Gemini Lender and the components of each of their Gemini Borrowings, including currency or asset type and amount, that comprise the Gemini Master Claim and intend to revise the Proposed Order and Exhibit 1 attached hereto to reflect any changes necessitated by the results of such discovery prior to the hearing on this Objection.

#### **SEPARATE CONTESTED MATTERS**

28. To the extent that a response is filed regarding any Disputed Claim listed in this Objection and the Debtors are unable to resolve the response, such Disputed Claim and the Objection by the Debtors to such claim asserted herein shall constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. Any order entered by the Court regarding this Objection shall be deemed a separate order with respect to each Disputed Claim.

#### **RESPONSES TO OMNIBUS OBJECTION**

29. To contest this Objection, a Gemini Claimant must file and serve a written response to this Objection (a "Response") so that it is received no later than **4:00 P.M.** (prevailing Eastern



Time) on **January 9, 2024** (the “Response Deadline”). Every Response must be filed electronically with the Court on the docket of *In re Genesis Global Holdco, LLC*, Case No. 23-10063 (the “Docket”) and served upon the following entities so that the Response is received no later than the Response Deadline, at the following addresses:

Cleary Gottlieb Steen & Hamilton LLP  
One Liberty Plaza  
New York, New York 10006  
Attn: Sean O’Neal, Esq., Luke A. Barefoot, Esq., and Jane VanLare, Esq.  
soneal@cgsh.com, lbarefoot@cgsh.com, and jvanlare@cgsh.com

-and-

Genesis Global Holdco, LLC  
175 Greenwich St., 38<sup>th</sup> Fl.  
New York, NY 10007  
Attn: Arianna Pretto-Sakman  
Arianna@Genesistrading.com

-and-

White & Case LLP  
1221 Avenue of the Americas  
New York, NY 10020  
Attn: Philip Abelson, Esq.  
philip.abelson@whitecase.com

-and-

Hughes Hubbard & Reid LLP  
One Battery Park Plaza, 16th Fl.  
New York, NY 10004  
Attn: Anson Frelinghuysen, Esq., Jeff Margolin, Esq., and Talia Helfrick, Esq.  
anson.frelinghuysen@hugheshubbard.com;  
jeff.margolin@hugheshubbard.com; alia.Helfrick@hugheshubbard.com

-and-

Bankruptcy Court of the Southern District of New York  
Chambers of Judge Sean H. Lane  
300 Quarropas Street  
White Plains, NY 10610

Attn: Chambers of Judge Sean H. Lane

30. Every Response to this Objection must contain, at minimum, the following information:

- a. A caption identifying the name of the Bankruptcy Court, the names of the Debtors, the case number and the title of the Objection to which the Response is directed;
- b. The name of the Claimant and description of the basis for the Claim;
- c. The specific factual basis and supporting legal argument upon which the party will rely in opposing this Objection;
- d. A short statement describing the reasons for which the Claim should not be disallowed as set forth in the Objection
- e. Additional documentation or other evidence upon which the Claimant relies in opposing the Objection (if it was not included with the Proof of Claim previously filed with the Bankruptcy Court);
- f. The address(es) to which the Debtors must return any reply to the Claimant's Response, if different from that presented in your Proof of Claim; and
- g. The name, address, and telephone number of the person (which may be the Claimant or its legal representative) holding ultimate authority to resolve the Claim on the Claimant's behalf.

31. If a Gemini Claimant fails to file and serve a timely Response by the Response Deadline, the Debtors may present to the Court an appropriate order disallowing or modifying the Disputed Claims, without further notice to the Gemini Claimant or a hearing.

### **REPLIES TO RESPONSES**

32. The Debtors may, at their option, file and serve a reply to any Response no later than two (2) business days prior to the Hearing.

### **ADJOURNMENT OF HEARING**

33. The Debtors reserve the right to adjourn the Hearing on any Responses to this Objection. In the event that the Debtors notice such an adjournment, it will be noted on the notice

of agenda for the Hearing, and such agenda will be served on the affected Gemini Claimants by serving the person designated in the Response.

### **RESERVATION OF RIGHTS**

34. The Debtors expressly reserve the right to amend, modify or supplement this Objection. Should the grounds of objection stated in this Objection be dismissed or overruled, the Debtors reserve the right to object to each of the Disputed Claims on any other grounds that the Debtors discover or elect to pursue. This Objection sets out non-substantive objections to each of the Disputed Claims identified in Exhibit 1 to the Proposed Order. The Debtors reserve their right to assert other non-substantive objections and/or one or more substantive objections to the Disputed Claims set forth in Exhibit 1 or the Gemini Master Claim at a later time, to the extent consistent with the Claims Objection Procedures Order.

35. Notwithstanding anything contained in this Objection or the attached exhibit, nothing herein shall be construed as a waiver of any rights that the Debtors may have to (a) commence avoidance actions under the applicable sections of the Bankruptcy Code, including, but not limited to, sections 547 and 548 of the Bankruptcy Code, against the Gemini Claimants subject to this Objection, (b) enforce the Debtors' rights of setoff against the Gemini Claimants relating to such avoidance actions or (c) seek disallowance pursuant to Bankruptcy Code section 502(d) of each of the Claims of the Claimants that are subject to such avoidance actions.

### **NOTICE**

36. The Debtors have provided notice of this Objection in accordance with the procedures set forth in the *Order Implementing Certain Notice and Case Management Procedures* (ECF No. 44) (the "Case Management Order"). The Debtors respectfully submit that no other or further notice need be provided.

**NO PRIOR REQUEST**

37. No prior request for the relief requested herein has been made to this or any other Court.

*[The remainder of this page is left blank intentionally]*

**CONCLUSION**

WHEREFORE, for the reason set forth herein the Debtors respectfully request that this Court (a) enter the Proposed Order and (b) grant such other and further relief as is just and proper.

Dated: December 19, 2023  
New York, New York

/s/ Luke A. Barefoot  
Sean A. O'Neal  
Luke A. Barefoot  
Jane VanLare  
CLEARY GOTTlieb STEEN &  
HAMILTON LLP  
One Liberty Plaza  
New York, New York 10006  
Telephone: (212) 225-2000  
Facsimile: (212) 225-3999

*Counsel to the Debtors  
and Debtors-in-Possession*

**EXHIBIT A**

**Proposed Order**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

Genesis Global Holdco, LLC, *et al.*,<sup>8</sup>

Debtors.

Chapter 11

Case No.: 23-10063 (SHL)

Jointly Administered

**ORDER GRANTING DEBTORS' FIFTEENTH  
OMNIBUS OBJECTION (NON-SUBSTANTIVE) TO CERTAIN  
CLAIMS PURSUANT TO 11 U.S.C. § 502 AND FED. R. BANKR. P. 3007 (DUPLICATE)**

Upon the *Debtors' Fifteenth Omnibus Objection (Non-Substantive) to Certain Claims Pursuant to 11 U.S.C. § 502 and Fed. R. Bankr. P. 3007 (Duplicate)* (the "Objection")<sup>9</sup> filed by the debtors in the above-captioned case (the "Debtors"), requesting an Order pursuant to section 502 of the Bankruptcy Code and Bankruptcy Rule 3007 disallowing and expunging in full each of the Disputed Claims identified in Exhibit 1 attached hereto; and upon the *Declaration of Paul Kinealy in Support of Debtors' Fifteenth Omnibus Objection (Non-Substantive) to Certain Claims Pursuant to 11 U.S.C. § 502 and Fed. R. Bankr. P. 3007 (Duplicate)*, attached to the Objection as Exhibit B; and upon all other documentation filed in connection with the Objection and the Claims; and adequate notice of the Objection having been given as set forth in the Objection; and it appearing that no other or further notice is required; and sufficient cause appearing therefor;

IT IS HEREBY ORDERED, ADJUDGED AND DECREED THAT:

<sup>8</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's tax identification number as applicable), are: Genesis Global Holdco, LLC (8219); Genesis Global Capital, LLC (8564); Genesis Asia Pacific Pte. Ltd. (2164R). For the purpose of these Chapter 11 Cases, the service address for the Debtors is 175 Greenwich Street, Floor 38, New York, NY 10007.

<sup>9</sup> Capitalized terms used, but not otherwise defined, herein shall have the meanings set forth in the Objection.

1. For the reasons stated in the Objection, the Objection is GRANTED with respect to each of the Disputed Claims identified in Exhibit 1 attached hereto.

2. Each of the Disputed Claims identified in Exhibit 1 is hereby disallowed in full and shall be automatically expunged from the Claims Register.

3. The Gemini Master Claim will be unaffected by this Order (subject to the Debtors' right to assert additional objections and defenses to the allowance of such claims), and Gemini's right to assert the liabilities on behalf of the Gemini Lenders against the Debtors' estates will be preserved through the Gemini Master Claim, subject to the Debtors' reservations of their rights to object to the Gemini Master Claim and other claims on all grounds, whether legal, factual, procedural, substantive or non-substantive.

4. This Order shall be deemed a separate Order with respect to each of the Disputed Claims identified in Exhibit 1. Any appeal and/or stay of this Order pending appeal by any Claimants whose Claims are subject to this Order shall only apply to the contested matter which involves such Claimant and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters listed in the Objection or this Order.

5. The Debtors, the Debtors' claims agent, Kroll Restructuring Administration LLC, and the Clerk of this Court are authorized to take all actions necessary and appropriate to give effect to this Order, including updating the Claims Register to reflect the relief granted herein.

6. Except as provided in this Order, nothing in this Order shall be deemed (i) an admission or finding as to the validity of any Claim against a Debtor, (ii) a waiver of the right of the Debtors to dispute any Claim against any Debtor on any grounds whatsoever at a later date, (iii) a promise by or requirement on any Debtor to pay any Claim, or (iv) a waiver of the rights of the Debtors under the Bankruptcy Code or any other applicable law.



7. This Court shall retain jurisdiction over any and all issues arising from or related to the implementation and interpretation of this Order.

Dated: \_\_\_\_\_, 2024  
White Plains, New York

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HONORABLE SEAN H. LANE  
UNITED STATES BANKRUPTCY JUDGE

**EXHIBIT 1**

**Disputed Claims**

Genesis Global Holdco, LLC Case No. 23-10063  
Fifteenth Omnibus Objection  
Exhibit 1 - Gemini Earn Duplicate

CLAIMS TO BE DISALLOWED						SURVIVING CLAIMS					
#	NAME & ADDRESS	CLAIM #	ASSERTED DEBTOR	DATE FILED	TOTAL ASSERTED IN KIND AMOUNT	NAME & ADDRESS	CLAIM #	REMAINING DEBTOR	DATE FILED	TOTAL REMAINING IN KIND AMOUNT	
1	NAME REDACTED ADDRESS REDACTED	1216	Genesis Global Holdco, LLC	12/5/2023*	1INCH 3 AXS 1 BTC 4 BCH 2 XLM 1 EOS 1 ETH 1 GUSD 1 LTC 1†	NAME REDACTED ADDRESS REDACTED	356	Genesis Global Capital, LLC	05/22/23	1INCH 3,012,033.46333801 AAVE 33,788.9425230479 ALCX 8,676.38998201275 AMP 425.936,380.55768 ANKR 23,335,928.0678024 APE 1,139,985.53964617 AXS 90,870.9278787395 BAL 34,868.7609066813 BAT 9,388,882.97197886 BCH 44,121.774231399 BNT 267,993.780189926 BTC 15,094.3806124709 CHZ 688,964.618297403 COMP 14,038.7643541652 CRV 3,110,821.20254412 DAI 8,326,580.27023902 DOGE 195,432,319.002998 ETH 157,019.767022979 FET 2,013,560.72967566 FIL 2,601,610.12844771 FTM 21,093,013.7169699 GRT 17,337,624.765759 GUSD 375,437,385.038869 INJ 135,922.613140235 KNC 434,572.643810026 LINK 1,524,285.66444107	
Reason: Asserted liabilities are duplicative of Gemini Master Claim.											
2	NAME REDACTED ADDRESS REDACTED	1234	Genesis Global Holdco, LLC	12/8/2023*	ETH 50.03404287†	NAME REDACTED ADDRESS REDACTED	356	Genesis Global Capital, LLC	05/22/23	1INCH 3,012,033.46333801 AAVE 33,788.9425230479 ALCX 8,676.38998201275 AMP 425.936,380.55768 ANKR 23,335,928.0678024 APE 1,139,985.53964617 AXS 90,870.9278787395 BAL 34,868.7609066813 BAT 9,388,882.97197886 BCH 44,121.774231399 BNT 267,993.780189926 BTC 15,094.3806124709 CHZ 688,964.618297403 COMP 14,038.7643541652 CRV 3,110,821.20254412 DAI 8,326,580.27023902 DOGE 195,432,319.002998 ETH 157,019.767022979 FET 2,013,560.72967566 FIL 2,601,610.12844771 FTM 21,093,013.7169699 GRT 17,337,624.765759 GUSD 375,437,385.038869 INJ 135,922.613140235 KNC 434,572.643810026 LINK 1,524,285.66444107	
Reason: Asserted liabilities are duplicative of Gemini Master Claim.											
3	NAME REDACTED ADDRESS REDACTED	1217	Genesis Global Capital, LLC	12/5/2023*	USD 2,136.73	NAME REDACTED ADDRESS REDACTED	356	Genesis Global Capital, LLC	05/22/23	1INCH 3,012,033.46333801 AAVE 33,788.9425230479 ALCX 8,676.38998201275 AMP 425.936,380.55768 ANKR 23,335,928.0678024 APE 1,139,985.53964617 AXS 90,870.9278787395 BAL 34,868.7609066813 BAT 9,388,882.97197886 BCH 44,121.774231399 BNT 267,993.780189926 BTC 15,094.3806124709 CHZ 688,964.618297403 COMP 14,038.7643541652 CRV 3,110,821.20254412 DAI 8,326,580.27023902 DOGE 195,432,319.002998 ETH 157,019.767022979 FET 2,013,560.72967566 FIL 2,601,610.12844771 FTM 21,093,013.7169699 GRT 17,337,624.765759 GUSD 375,437,385.038869 INJ 135,922.613140235 KNC 434,572.643810026 LINK 1,524,285.66444107	
Reason: Asserted liabilities are duplicative of Gemini Master Claim.											

†Indicates claim contains unliquidated and/or undetermined amounts

\*Claim was filed after the General Bar Date

Genesis Global Holdco, LLC Case No. 23-10063  
Fifteenth Omnibus Objection  
Exhibit 1 - Gemini Earn Duplicate

CLAIMS TO BE DISALLOWED						SURVIVING CLAIMS					
#	NAME & ADDRESS	CLAIM #	ASSERTED DEBTOR	DATE FILED	TOTAL ASSERTED IN KIND AMOUNT	NAME & ADDRESS	CLAIM #	REMAINING DEBTOR	DATE FILED	TOTAL REMAINING IN KIND AMOUNT	
4	NAME REDACTED ADDRESS REDACTED	1215	Genesis Global Capital, LLC	12/5/2023*	AMP 20,136.71896 FIL 14,795786 USD 123.65	NAME REDACTED ADDRESS REDACTED	356	Genesis Global Capital, LLC	05/22/23	IINCH 3,012,033.46333801 AAVE 33,788.9425230479 ALCX 8,676.38998201275 AMP 425,936,380.55768 ANKR 23,335,928.0678024 APE 1,139,985.53964617 AXS 90,870.9278787395 BAL 34,868.7609066813 BAT 9,388,882.97197886 BCH 44,121.774231399 BNT 267,993.780189926 BTC 15,094.3806124709 CHZ 688,964.618297403 COMP 14,038.7643541652 CRV 3,110,821.20254412 DAI 8,326,580.27023902 DOGE 195,432,319.002998 ETH 157,019.767022979 FET 2,013,560.72967566 FIL 2,601,610.12844771 FTM 21,093.013.7169699 GRT 17,337,624.765759 GUSD 375,437,385.038869 INJ 135,922.613140235 KNC 434,572.643810026 LINK 1,524,285.66444107 LPT 24,673.1466099058 LRC 2,690,498.81970212 LTC 127,209.281884632 MANA 5,593,977.33440294 MATIC 16,964,467.2401572 MKR 1,338.38038533215 OXT 3,699,739.25944469 PAXG 1,014.97374057132 RBN 25,405.5734626778 REN 4,231,486.62614094 RLY 5,660,470.4301708 SKL 3,980,478.77162429 SNX 237,906.952970567 SOL 284,128.9239429 STORJ 1,811,065.26135581 SUSHI 597,029.850730662 TOKE 24,563.5645986667 UMA 60,303.1821763762 UNI 511,292.129900501 USD 1,122,467,217.65 USDC 55,215,289.1233817 USTC 1,260.54344897418 XTZ 695,291.945724483 YFI 128.160239144428 ZEC 43,919.4737009613 ZRX 2,737,146.67279388†	
Reason: Asserted liabilities are duplicative of Gemini Master Claim.											
5	NAME REDACTED ADDRESS REDACTED	1220	Genesis Global Holdco, LLC	12/5/2023*	ETH 1.00883546 USD 2,276.59	NAME REDACTED ADDRESS REDACTED	356	Genesis Global Capital, LLC	05/22/23	IINCH 3,012,033.46333801 AAVE 33,788.9425230479 ALCX 8,676.38998201275 AMP 425,936,380.55768 ANKR 23,335,928.0678024 APE 1,139,985.53964617 AXS 90,870.9278787395 BAL 34,868.7609066813 BAT 9,388,882.97197886 BCH 44,121.774231399 BNT 267,993.780189926 BTC 15,094.3806124709 CHZ 688,964.618297403 COMP 14,038.7643541652 CRV 3,110,821.20254412 DAI 8,326,580.27023902 DOGE 195,432,319.002998 ETH 157,019.767022979 FET 2,013,560.72967566 FIL 2,601,610.12844771 FTM 21,093.013.7169699 GRT 17,337,624.765759 GUSD 375,437,385.038869 INJ 135,922.613140235 KNC 434,572.643810026 LINK 1,524,285.66444107 LPT 24,673.1466099058 LRC 2,690,498.81970212 LTC 127,209.281884632 MANA 5,593,977.33440294 MATIC 16,964,467.2401572 MKR 1,338.38038533215 OXT 3,699,739.25944469 PAXG 1,014.97374057132 RBN 25,405.5734626778 REN 4,231,486.62614094 RLY 5,660,470.4301708 SKL 3,980,478.77162429 SNX 237,906.952970567 SOL 284,128.9239429 STORJ 1,811,065.26135581 SUSHI 597,029.850730662 TOKE 24,563.5645986667 UMA 60,303.1821763762 UNI 511,292.129900501 USD 1,122,467,217.65 USDC 55,215,289.1233817 USTC 1,260.54344897418 XTZ 695,291.945724483 YFI 128.160239144428 ZEC 43,919.4737009613 ZRX 2,737,146.67279388†	
Reason: Asserted liabilities are duplicative of Gemini Master Claim.											
6	NAME REDACTED ADDRESS REDACTED	1203	Genesis Global Holdco, LLC	11/29/2023*	MATIC 330.92709625†	NAME REDACTED ADDRESS REDACTED	356	Genesis Global Capital, LLC	05/22/23	IINCH 3,012,033.46333801 AAVE 33,788.9425230479 ALCX 8,676.38998201275 AMP 425,936,380.55768 ANKR 23,335,928.0678024 APE 1,139,985.53964617 AXS 90,870.9278787395 BAL 34,868.7609066813 BAT 9,388,882.97197886 BCH 44,121.774231399 BNT 267,993.780189926 BTC 15,094.3806124709 CHZ 688,964.618297403 COMP 14,038.7643541652 CRV 3,110,821.20254412 DAI 8,326,580.27023902 DOGE 195,432,319.002998 ETH 157,019.767022979 FET 2,013,560.72967566 FIL 2,601,610.12844771 FTM 21,093.013.7169699 GRT 17,337,624.765759 GUSD 375,437,385.038869 INJ 135,922.613140235 KNC 434,572.643810026 LINK 1,524,285.66444107 LPT 24,673.1466099058 LRC 2,690,498.81970212 LTC 127,209.281884632 MANA 5,593,977.33440294 MATIC 16,964,467.2401572 MKR 1,338.38038533215 OXT 3,699,739.25944469 PAXG 1,014.97374057132 RBN 25,405.5734626778 REN 4,231,486.62614094 RLY 5,660,470.4301708 SKL 3,980,478.77162429 SNX 237,906.952970567 SOL 284,128.9239429 STORJ 1,811,065.26135581 SUSHI 597,029.850730662 TOKE 24,563.5645986667 UMA 60,303.1821763762 UNI 511,292.129900501 USD 1,122,467,217.65 USDC 55,215,289.1233817 USTC 1,260.54344897418 XTZ 695,291.945724483 YFI 128.160239144428 ZEC 43,919.4737009613 ZRX 2,737,146.67279388†	
Reason: Asserted liabilities are duplicative of Gemini Master Claim.											

†Indicates claim contains unliquidated and/or undetermined amounts

\*Claim was filed after the General Bar Date

Genesis Global Holdco, LLC Case No. 23-10063  
Fifteenth Omnibus Objection  
Exhibit 1 - Gemini Earn Duplicate

CLAIMS TO BE DISALLOWED					SURVIVING CLAIMS					
#	NAME & ADDRESS	CLAIM #	ASSERTED DEBTOR	DATE FILED	TOTAL ASSERTED IN KIND AMOUNT	NAME & ADDRESS	CLAIM #	REMAINING DEBTOR	DATE FILED	TOTAL REMAINING IN KIND AMOUNT
7	NAME REDACTED ADDRESS REDACTED	1225	Genesis Global Holdco, LLC	12/6/2023*	DOGE 4,510.38424452 USD 438	NAME REDACTED ADDRESS REDACTED	356	Genesis Global Capital, LLC	05/22/23	IINCH 3,012,033.46333801 LPT 24,673.1466099058 AAVE 33,788.9425230479 LRC 2,690.498.81970212 ALCX 8,676.38998201275 LTC 127,209.281884632 AMP 425.936.380.55768 MANA 5,593.977.33440294 ANKR 23,335.928.0678024 MATIC 16,964.467.2401572 APE 1,139.985.53964617 MKR 1,338.38038533215 AXS 90,870.9278787395 OXT 3,699.739.25944469 BAL 34,868.7609066813 PAXG 1,014.97374057132 BAT 9,388.882.97197886 RBN 25,405.5734626778 BCH 44,121.774231399 REN 4,231.486.62614094 BNT 267,993.780189926 RLY 5,660.470.4301708 BTC 15,094.3806124709 SKL 3,980.478.77162429 CHZ 688,964.618297403 SNX 237,906.952970567 COMP 14,038.7643541652 SOL 284,128.92393429 CRV 3,110.821.20254412 STORJ 1,811,065.26135581 DAI 8,326.580.27023902 SUSHI 597,029.850730662 DOGE 195,432,319.002998 TOKE 24,563.5645986667 ETH 157,019.767022979 UMA 60,303.1821763762 FET 2,013,560.72967566 UNI 511,292.129900501 FIL 2,601,610.12844771 USD 1,122,467.217.65 FTM 21,093.013.7169699 USDC 55,215.289.1233817 GRT 17,337,624.765759 USTC 1,260.54344897418 GUSD 375,437,385.038869 XTZ 695,291.945724483 INJ 135,922.613140235 YFI 128.160239144428 KNC 434,572.643810026 ZEC 43,919.4737009613 LINK 1,524,285.66444107 ZRX 2,737,146.67279388†
Reason: Asserted liabilities are duplicative of Gemini Master Claim.										
8	NAME REDACTED ADDRESS REDACTED	1208	Genesis Global Holdco, LLC	12/3/2023*	MATIC 3.07440862 BTC 0.11127397 SHIB 192,745.38111077 CRV 85.64688874 MANA 29.747904 DOGE 231.93163717 FTM 138.89526693 SLP 9 SPELL 9 ELON 9 USD 57.36	NAME REDACTED ADDRESS REDACTED	356	Genesis Global Capital, LLC	05/22/23	IINCH 3,012,033.46333801 LPT 24,673.1466099058 AAVE 33,788.9425230479 LRC 2,690.498.81970212 ALCX 8,676.38998201275 LTC 127,209.281884632 AMP 425.936.380.55768 MANA 5,593.977.33440294 ANKR 23,335.928.0678024 MATIC 16,964.467.2401572 APE 1,139.985.53964617 MKR 1,338.38038533215 AXS 90,870.9278787395 OXT 3,699.739.25944469 BAL 34,868.7609066813 PAXG 1,014.97374057132 BAT 9,388.882.97197886 RBN 25,405.5734626778 BCH 44,121.774231399 REN 4,231.486.62614094 BNT 267,993.780189926 RLY 5,660.470.4301708 BTC 15,094.3806124709 SKL 3,980.478.77162429 CHZ 688,964.618297403 SNX 237,906.952970567 COMP 14,038.7643541652 SOL 284,128.92393429 CRV 3,110.821.20254412 STORJ 1,811,065.26135581 DAI 8,326.580.27023902 SUSHI 597,029.850730662 DOGE 195,432,319.002998 TOKE 24,563.5645986667 ETH 157,019.767022979 UMA 60,303.1821763762 FET 2,013,560.72967566 UNI 511,292.129900501 FIL 2,601,610.12844771 USD 1,122,467.217.65 FTM 21,093.013.7169699 USDC 55,215.289.1233817 GRT 17,337,624.765759 USTC 1,260.54344897418 GUSD 375,437,385.038869 XTZ 695,291.945724483 INJ 135,922.613140235 YFI 128.160239144428 KNC 434,572.643810026 ZEC 43,919.4737009613 LINK 1,524,285.66444107 ZRX 2,737,146.67279388†
Reason: Asserted liabilities are duplicative of Gemini Master Claim.										
9	NAME REDACTED ADDRESS REDACTED	1218	Genesis Asia Pacific Pte. Ltd. (Singapore)	12/6/2023*	BTC 0.10956612 ETH 1.153288†	NAME REDACTED ADDRESS REDACTED	356	Genesis Global Capital, LLC	05/22/23	IINCH 3,012,033.46333801 LPT 24,673.1466099058 AAVE 33,788.9425230479 LRC 2,690.498.81970212 ALCX 8,676.38998201275 LTC 127,209.281884632 AMP 425.936.380.55768 MANA 5,593.977.33440294 ANKR 23,335.928.0678024 MATIC 16,964.467.2401572 APE 1,139.985.53964617 MKR 1,338.38038533215 AXS 90,870.9278787395 OXT 3,699.739.25944469 BAL 34,868.7609066813 PAXG 1,014.97374057132 BAT 9,388.882.97197886 RBN 25,405.5734626778 BCH 44,121.774231399 REN 4,231.486.62614094 BNT 267,993.780189926 RLY 5,660.470.4301708 BTC 15,094.3806124709 SKL 3,980.478.77162429 CHZ 688,964.618297403 SNX 237,906.952970567 COMP 14,038.7643541652 SOL 284,128.92393429 CRV 3,110.821.20254412 STORJ 1,811,065.26135581 DAI 8,326.580.27023902 SUSHI 597,029.850730662 DOGE 195,432,319.002998 TOKE 24,563.5645986667 ETH 157,019.767022979 UMA 60,303.1821763762 FET 2,013,560.72967566 UNI 511,292.129900501 FIL 2,601,610.12844771 USD 1,122,467.217.65 FTM 21,093.013.7169699 USDC 55,215.289.1233817 GRT 17,337,624.765759 USTC 1,260.54344897418 GUSD 375,437,385.038869 XTZ 695,291.945724483 INJ 135,922.613140235 YFI 128.160239144428 KNC 434,572.643810026 ZEC 43,919.4737009613 LINK 1,524,285.66444107 ZRX 2,737,146.67279388†
Reason: Asserted liabilities are duplicative of Gemini Master Claim.										

†Indicates claim contains unliquidated and/or undetermined amounts

\*Claim was filed after the General Bar Date

Genesis Global Holdco, LLC Case No. 23-10063  
Fifteenth Omnibus Objection  
Exhibit 1 - Gemini Earn Duplicate

CLAIMS TO BE DISALLOWED						SURVIVING CLAIMS					
#	NAME & ADDRESS	CLAIM #	ASSERTED DEBTOR	DATE FILED	TOTAL ASSERTED IN KIND AMOUNT	NAME & ADDRESS	CLAIM #	REMAINING DEBTOR	DATE FILED	TOTAL REMAINING IN KIND AMOUNT	
10	NAME REDACTED ADDRESS REDACTED	1204	Genesis Global Capital, LLC	11/29/2023*	GUSD 506.87 USD 506.87	NAME REDACTED ADDRESS REDACTED	356	Genesis Global Capital, LLC	05/22/23	IINCH 3,012,033.46333801 AAVE 33,788.9425230479 ALCX 8,676.38998201275 AMP 425.936,380.55768 ANKR 23,335,928.0678024 APE 1,139,985.53964617 AXS 90,870.9278787395 BAL 34,868.7609066813 BAT 9,388,882.97197886 BCH 44,121.774231399 BNT 267,993.780189926 BTC 15,094.3806124709 CHZ 688,964.618297403 COMP 14,038.7643541652 CRV 3,110,821.20254412 DAI 8,326,580.27023902 DOGE 195,432.319.002998 ETH 157,019.767022979 FET 2,013,560.72967566 FIL 2,601,610.12844771 FTM 21,093,013.7169699 GRT 17,337,624.765759 GUSD 375,437.385.038869 INJ 135,922.613140235 KNC 434,572.643810026 LINK 1,524,285.66444107	LPT 24,673.1466099058 LRC 2,690,498.81970212 LTC 127,209.281884632 MANA 5,593,977.33440294 MATIC 16,964,467.2401572 MKR 1,338.38038533215 OXT 3,699,739.25944469 PAXG 1,014.97374057132 RBN 25,405.5734626778 REN 4,231.486,62614094 RLY 5,660,470.4301708 SKL 3,980,478.77162429 SNX 237,906.952970567 SOL 284,128.92393429 STORJ 1,811,065.26135581 SUSHI 597,029.850730662 TOKE 24,563.5645986667 UMA 60,303.1821763762 UNI 511,292.129900501 USD 1,122,467,217.65 USDC 55,215,289.1233817 USTC 1,260.54344897418 XTZ 695,291.945724483 YFI 128,160239144428 ZEC 43,919.4737009613 ZRX 2,737,146.67279388†
Reason: Asserted liabilities are duplicative of Gemini Master Claim.											
11	NAME REDACTED ADDRESS REDACTED	1214	Genesis Global Holdco, LLC	12/5/2023*	AAVE 0.26592876 AMP 18,732.69474158 LINK 84.68080019 ETH 1.19210185 LTC 3.29045243†	NAME REDACTED ADDRESS REDACTED	356	Genesis Global Capital, LLC	05/22/23	IINCH 3,012,033.46333801 AAVE 33,788.9425230479 ALCX 8,676.38998201275 AMP 425.936,380.55768 ANKR 23,335,928.0678024 APE 1,139,985.53964617 AXS 90,870.9278787395 BAL 34,868.7609066813 BAT 9,388,882.97197886 BCH 44,121.774231399 BNT 267,993.780189926 BTC 15,094.3806124709 CHZ 688,964.618297403 COMP 14,038.7643541652 CRV 3,110,821.20254412 DAI 8,326,580.27023902 DOGE 195,432.319.002998 ETH 157,019.767022979 FET 2,013,560.72967566 FIL 2,601,610.12844771 FTM 21,093,013.7169699 GRT 17,337,624.765759 GUSD 375,437.385.038869 INJ 135,922.613140235 KNC 434,572.643810026 LINK 1,524,285.66444107	LPT 24,673.1466099058 LRC 2,690,498.81970212 LTC 127,209.281884632 MANA 5,593,977.33440294 MATIC 16,964,467.2401572 MKR 1,338.38038533215 OXT 3,699,739.25944469 PAXG 1,014.97374057132 RBN 25,405.5734626778 REN 4,231.486,62614094 RLY 5,660,470.4301708 SKL 3,980,478.77162429 SNX 237,906.952970567 SOL 284,128.92393429 STORJ 1,811,065.26135581 SUSHI 597,029.850730662 TOKE 24,563.5645986667 UMA 60,303.1821763762 UNI 511,292.129900501 USD 1,122,467,217.65 USDC 55,215,289.1233817 USTC 1,260.54344897418 XTZ 695,291.945724483 YFI 128,160239144428 ZEC 43,919.4737009613 ZRX 2,737,146.67279388†
Reason: Asserted liabilities are duplicative of Gemini Master Claim.											
12	NAME REDACTED ADDRESS REDACTED	1221	Genesis Global Holdco, LLC	12/1/2023*	USD 2,555.50	NAME REDACTED ADDRESS REDACTED	356	Genesis Global Capital, LLC	05/22/23	IINCH 3,012,033.46333801 AAVE 33,788.9425230479 ALCX 8,676.38998201275 AMP 425.936,380.55768 ANKR 23,335,928.0678024 APE 1,139,985.53964617 AXS 90,870.9278787395 BAL 34,868.7609066813 BAT 9,388,882.97197886 BCH 44,121.774231399 BNT 267,993.780189926 BTC 15,094.3806124709 CHZ 688,964.618297403 COMP 14,038.7643541652 CRV 3,110,821.20254412 DAI 8,326,580.27023902 DOGE 195,432.319.002998 ETH 157,019.767022979 FET 2,013,560.72967566 FIL 2,601,610.12844771 FTM 21,093,013.7169699 GRT 17,337,624.765759 GUSD 375,437.385.038869 INJ 135,922.613140235 KNC 434,572.643810026 LINK 1,524,285.66444107	LPT 24,673.1466099058 LRC 2,690,498.81970212 LTC 127,209.281884632 MANA 5,593,977.33440294 MATIC 16,964,467.2401572 MKR 1,338.38038533215 OXT 3,699,739.25944469 PAXG 1,014.97374057132 RBN 25,405.5734626778 REN 4,231.486,62614094 RLY 5,660,470.4301708 SKL 3,980,478.77162429 SNX 237,906.952970567 SOL 284,128.92393429 STORJ 1,811,065.26135581 SUSHI 597,029.850730662 TOKE 24,563.5645986667 UMA 60,303.1821763762 UNI 511,292.129900501 USD 1,122,467,217.65 USDC 55,215,289.1233817 USTC 1,260.54344897418 XTZ 695,291.945724483 YFI 128,160239144428 ZEC 43,919.4737009613 ZRX 2,737,146.67279388†
Reason: Asserted liabilities are duplicative of Gemini Master Claim.											

†Indicates claim contains unliquidated and/or undetermined amounts

\*Claim was filed after the General Bar Date

Genesis Global Holdco, LLC Case No. 23-10063  
Fifteenth Omnibus Objection  
Exhibit 1 - Gemini Earn Duplicate

CLAIMS TO BE DISALLOWED						SURVIVING CLAIMS					
#	NAME & ADDRESS	CLAIM #	ASSERTED DEBTOR	DATE FILED	TOTAL ASSERTED IN KIND AMOUNT	NAME & ADDRESS	CLAIM #	REMAINING DEBTOR	DATE FILED	TOTAL REMAINING IN KIND AMOUNT	
13	NAME REDACTED ADDRESS REDACTED	1191	Genesis Global Holdco, LLC	11/19/2023*	IINCH 105 USD 115	NAME REDACTED ADDRESS REDACTED	356	Genesis Global Capital, LLC	05/22/23	IINCH 3,012,033.46333801 AAVE 33,788.9425230479 ALCX 8,676.38998201275 AMP 425.936,380.55768 ANKR 23,335,928.0678024 APE 1,139,985.53964617 AXS 90,870.9278787395 BAL 34,868.7609066813 BAT 9,388,882.97197886 BCH 44,121.774231399 BNT 267,993.780189926 BTC 15,094.3806124709 CHZ 688,964.618297403 COMP 14,038.7643541652 CRV 3,110,821.20254412 DAI 8,326,580.27023902 DOGE 195,432,319.002998 ETH 157,019.767022979 FET 2,013,560.72967566 FIL 2,601,610.12844771 FTM 21,093,013.7169699 GRT 17,337,624.765759 GUSD 375,437,385.038869 INJ 135,922.613140235 KNC 434,572.643810026 LINK 1,524,285.66444107	LPT 24,673.1466099058 LRC 2,690,498.81970212 LTC 127,209.281884632 MANA 5,593,977.33440294 MATIC 16,964,467.2401572 MKR 1,338.38038533215 OXT 3,699,739.25944469 PAXG 1,014.97374057132 RBN 25,405.5734626778 REN 4,231,486.62614094 RLY 5,660,470.4301708 SKL 3,980,478.77162429 SNX 237,906.952970567 SOL 284,128.92393429 STORJ 1,811,065.26135581 SUSHI 597,029.850730662 TOKE 24,563.5645986667 UMA 60,303.1821763762 UNI 511,292.129900501 USD 1,122,467,217.65 USDC 55,215,289.1233817 USTC 1,260.54344897418 XTZ 695,291.945724483 YFI 128.160239144428 ZEC 43,919.4737009613 ZRX 2,737,146.67279388†
Reason: Asserted liabilities are duplicative of Gemini Master Claim.											
14	NAME REDACTED ADDRESS REDACTED	1219	Genesis Global Holdco, LLC	12/5/2023*	IINCH 21.6188986477473 AAVE 0.626440077191005 DAI 73.5382763048902 MATIC 0.0272727921880871 ETH 0.140014207543533 FIL 0.785821161950346†	NAME REDACTED ADDRESS REDACTED	356	Genesis Global Capital, LLC	05/22/23	IINCH 3,012,033.46333801 AAVE 33,788.9425230479 ALCX 8,676.38998201275 AMP 425.936,380.55768 ANKR 23,335,928.0678024 APE 1,139,985.53964617 AXS 90,870.9278787395 BAL 34,868.7609066813 BAT 9,388,882.97197886 BCH 44,121.774231399 BNT 267,993.780189926 BTC 15,094.3806124709 CHZ 688,964.618297403 COMP 14,038.7643541652 CRV 3,110,821.20254412 DAI 8,326,580.27023902 DOGE 195,432,319.002998 ETH 157,019.767022979 FET 2,013,560.72967566 FIL 2,601,610.12844771 FTM 21,093,013.7169699 GRT 17,337,624.765759 GUSD 375,437,385.038869 INJ 135,922.613140235 KNC 434,572.643810026 LINK 1,524,285.66444107	LPT 24,673.1466099058 LRC 2,690,498.81970212 LTC 127,209.281884632 MANA 5,593,977.33440294 MATIC 16,964,467.2401572 MKR 1,338.38038533215 OXT 3,699,739.25944469 PAXG 1,014.97374057132 RBN 25,405.5734626778 REN 4,231,486.62614094 RLY 5,660,470.4301708 SKL 3,980,478.77162429 SNX 237,906.952970567 SOL 284,128.92393429 STORJ 1,811,065.26135581 SUSHI 597,029.850730662 TOKE 24,563.5645986667 UMA 60,303.1821763762 UNI 511,292.129900501 USD 1,122,467,217.65 USDC 55,215,289.1233817 USTC 1,260.54344897418 XTZ 695,291.945724483 YFI 128.160239144428 ZEC 43,919.4737009613 ZRX 2,737,146.67279388†
Reason: Asserted liabilities are duplicative of Gemini Master Claim.											
15	NAME REDACTED ADDRESS REDACTED	1190	Genesis Global Capital, LLC	11/21/2023*	GUSD 18,632.03 USD 18,632.03	NAME REDACTED ADDRESS REDACTED	356	Genesis Global Capital, LLC	05/22/23	IINCH 3,012,033.46333801 AAVE 33,788.9425230479 ALCX 8,676.38998201275 AMP 425.936,380.55768 ANKR 23,335,928.0678024 APE 1,139,985.53964617 AXS 90,870.9278787395 BAL 34,868.7609066813 BAT 9,388,882.97197886 BCH 44,121.774231399 BNT 267,993.780189926 BTC 15,094.3806124709 CHZ 688,964.618297403 COMP 14,038.7643541652 CRV 3,110,821.20254412 DAI 8,326,580.27023902 DOGE 195,432,319.002998 ETH 157,019.767022979 FET 2,013,560.72967566 FIL 2,601,610.12844771 FTM 21,093,013.7169699 GRT 17,337,624.765759 GUSD 375,437,385.038869 INJ 135,922.613140235 KNC 434,572.643810026 LINK 1,524,285.66444107	LPT 24,673.1466099058 LRC 2,690,498.81970212 LTC 127,209.281884632 MANA 5,593,977.33440294 MATIC 16,964,467.2401572 MKR 1,338.38038533215 OXT 3,699,739.25944469 PAXG 1,014.97374057132 RBN 25,405.5734626778 REN 4,231,486.62614094 RLY 5,660,470.4301708 SKL 3,980,478.77162429 SNX 237,906.952970567 SOL 284,128.92393429 STORJ 1,811,065.26135581 SUSHI 597,029.850730662 TOKE 24,563.5645986667 UMA 60,303.1821763762 UNI 511,292.129900501 USD 1,122,467,217.65 USDC 55,215,289.1233817 USTC 1,260.54344897418 XTZ 695,291.945724483 YFI 128.160239144428 ZEC 43,919.4737009613 ZRX 2,737,146.67279388†
Reason: Asserted liabilities are duplicative of Gemini Master Claim.											

†Indicates claim contains unliquidated and/or undetermined amounts

\*Claim was filed after the General Bar Date

Genesis Global Holdco, LLC Case No. 23-10063  
Fifteenth Omnibus Objection  
Exhibit 1 - Gemini Earn Duplicate

CLAIMS TO BE DISALLOWED						SURVIVING CLAIMS					
#	NAME & ADDRESS	CLAIM #	ASSERTED DEBTOR	DATE FILED	TOTAL ASSERTED IN KIND AMOUNT	NAME & ADDRESS	CLAIM #	REMAINING DEBTOR	DATE FILED	TOTAL REMAINING IN KIND AMOUNT	
16	NAME REDACTED ADDRESS REDACTED	429	Genesis Global Capital, LLC	05/22/23	BTC 0.05033332 LINK 69.895589 GUSD 629,126.61†	NAME REDACTED ADDRESS REDACTED	356	Genesis Global Capital, LLC	05/22/23	IINCH 3,012,033.46333801 AAVE 33,788.9425230479 ALCX 8,676.38998201275 AMP 425.936,380.55768 ANKR 23,335,928.0678024 APE 1,139,985.53964617 AXS 90,870.9278787395 BAL 34,868.7609066813 BAT 9,388,882.97197886 BCH 44,121.774231399 BNT 267,993.780189926 BTC 15,094.3806124709 CHZ 688,964.618297403 COMP 14,038.7643541652 CRV 3,110,821.20254412 DAI 8,326,580.27023902 DOGE 195,432,319.002998 ETH 157,019.767022979 FET 2,013,560.72967566 FIL 2,601,610.12844771 FTM 21,093,013.7169699 GRT 17,337,624.765759 GUSD 375,437,385.038869 INJ 135,922.613140235 KNC 434,572.643810026 LINK 1,524,285.66444107  LPT 24,673.1466099058 LRC 2,690,498.81970212 LTC 127,209.281884632 MANA 5,593,977.33440294 MATIC 16,964,467.2401572 MKR 1,338.38038533215 OXT 3,699,739.25944469 PAXG 1,014.97374057132 RBN 25,405.5734626778 REN 4,231,486.62614094 RLY 5,660,470.4301708 SKL 3,980,478.77162429 SNX 237,906.952970567 SOL 284,128.92393429 STORJ 1,811,065.26135581 SUSHI 597,029.850730662 TOKE 24,563.5645986667 UMA 60,303.1821763762 UNI 511,292.129900501 USD 1,122,467,217.65 USDC 55,215,289.1233817 USTC 1,260.54344897418 XTZ 695,291.945724483 YFI 128.160239144428 ZEC 43,919.4737009613 ZRX 2,737,146.67279388†	
Reason: Asserted liabilities are duplicative of Gemini Master Claim.											
17	NAME REDACTED ADDRESS REDACTED	1226	Genesis Global Holdco, LLC	12/6/2023*	SOL 1.5 GUSD 1,100 USD 1,100	NAME REDACTED ADDRESS REDACTED	356	Genesis Global Capital, LLC	05/22/23	IINCH 3,012,033.46333801 AAVE 33,788.9425230479 ALCX 8,676.38998201275 AMP 425.936,380.55768 ANKR 23,335,928.0678024 APE 1,139,985.53964617 AXS 90,870.9278787395 BAL 34,868.7609066813 BAT 9,388,882.97197886 BCH 44,121.774231399 BNT 267,993.780189926 BTC 15,094.3806124709 CHZ 688,964.618297403 COMP 14,038.7643541652 CRV 3,110,821.20254412 DAI 8,326,580.27023902 DOGE 195,432,319.002998 ETH 157,019.767022979 FET 2,013,560.72967566 FIL 2,601,610.12844771 FTM 21,093,013.7169699 GRT 17,337,624.765759 GUSD 375,437,385.038869 INJ 135,922.613140235 KNC 434,572.643810026 LINK 1,524,285.66444107  LPT 24,673.1466099058 LRC 2,690,498.81970212 LTC 127,209.281884632 MANA 5,593,977.33440294 MATIC 16,964,467.2401572 MKR 1,338.38038533215 OXT 3,699,739.25944469 PAXG 1,014.97374057132 RBN 25,405.5734626778 REN 4,231,486.62614094 RLY 5,660,470.4301708 SKL 3,980,478.77162429 SNX 237,906.952970567 SOL 284,128.92393429 STORJ 1,811,065.26135581 SUSHI 597,029.850730662 TOKE 24,563.5645986667 UMA 60,303.1821763762 UNI 511,292.129900501 USD 1,122,467,217.65 USDC 55,215,289.1233817 USTC 1,260.54344897418 XTZ 695,291.945724483 YFI 128.160239144428 ZEC 43,919.4737009613 ZRX 2,737,146.67279388†	
Reason: Asserted liabilities are duplicative of Gemini Master Claim.											
18	NAME REDACTED ADDRESS REDACTED	1228	Genesis Global Capital, LLC	12/6/2023*	LPT 2.95 AAVE 0.4845 OXT 92.99 REN 78.92 CRV 15.59 SNX 3.96 MANA 16.34 UNI 2.62 USD 2,000†	NAME REDACTED ADDRESS REDACTED	356	Genesis Global Capital, LLC	05/22/23	IINCH 3,012,033.46333801 AAVE 33,788.9425230479 ALCX 8,676.38998201275 AMP 425.936,380.55768 ANKR 23,335,928.0678024 APE 1,139,985.53964617 AXS 90,870.9278787395 BAL 34,868.7609066813 BAT 9,388,882.97197886 BCH 44,121.774231399 BNT 267,993.780189926 BTC 15,094.3806124709 CHZ 688,964.618297403 COMP 14,038.7643541652 CRV 3,110,821.20254412 DAI 8,326,580.27023902 DOGE 195,432,319.002998 ETH 157,019.767022979 FET 2,013,560.72967566 FIL 2,601,610.12844771 FTM 21,093,013.7169699 GRT 17,337,624.765759 GUSD 375,437,385.038869 INJ 135,922.613140235 KNC 434,572.643810026 LINK 1,524,285.66444107  LPT 24,673.1466099058 LRC 2,690,498.81970212 LTC 127,209.281884632 MANA 5,593,977.33440294 MATIC 16,964,467.2401572 MKR 1,338.38038533215 OXT 3,699,739.25944469 PAXG 1,014.97374057132 RBN 25,405.5734626778 REN 4,231,486.62614094 RLY 5,660,470.4301708 SKL 3,980,478.77162429 SNX 237,906.952970567 SOL 284,128.92393429 STORJ 1,811,065.26135581 SUSHI 597,029.850730662 TOKE 24,563.5645986667 UMA 60,303.1821763762 UNI 511,292.129900501 USD 1,122,467,217.65 USDC 55,215,289.1233817 USTC 1,260.54344897418 XTZ 695,291.945724483 YFI 128.160239144428 ZEC 43,919.4737009613 ZRX 2,737,146.67279388†	
Reason: Asserted liabilities are duplicative of Gemini Master Claim.											

†Indicates claim contains unliquidated and/or undetermined amounts

\*Claim was filed after the General Bar Date



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Fifteenth Omnibus Objection  
Exhibit 1 - Gemini Earn Duplicate

CLAIMS TO BE DISALLOWED						SURVIVING CLAIMS					
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19	NAME REDACTED ADDRESS REDACTED	1196	Genesis Global Holdco, LLC	11/22/2023*	FIL 50 USD 200	NAME REDACTED ADDRESS REDACTED	356	Genesis Global Capital, LLC	05/22/23	IINCH 3,012,033.46333801 AAVE 33,788.9425230479 ALCX 8,676.38998201275 AMP 425.936,380.55768 ANKR 23,335,928.0678024 APE 1,139,985.53964617 AXS 90,870.9278787395 BAL 34,868.7609066813 BAT 9,388,882.97197886 BCH 44,121.774231399 BNT 267,993.780189926 BTC 15,094.3806124709 CHZ 688,964.618297403 COMP 14,038.7643541652 CRV 3,110,821.20254412 DAI 8,326,580.27023902 DOGE 195,432,319.002998 ETH 157,019.767022979 FET 2,013,560.72967566 FIL 2,601,610.12844771 FTM 21,093,013.7169699 GRT 17,337,624.765759 GUSD 375,437,385.038869 INJ 135,922.613140235 KNC 434,572.643810026 LINK 1,524,285.66444107  LPT 24,673.1466099058 LRC 2,690,498.81970212 LTC 127,209.281884632 MANA 5,593,977.33440294 MATIC 16,964,467.2401572 MKR 1,338.38038533215 OXT 3,699,739.25944469 PAXG 1,014.97374057132 RBN 25,405.5734626778 REN 4,231,486.62614094 RLY 5,660,470.4301708 SKL 3,980,478.77162429 SNX 237,906.952970567 SOL 284,128.92393429 STORJ 1,811,065.26135581 SUSHI 597,029.850730662 TOKE 24,563.5645986667 UMA 60,303.1821763762 UNI 511,292.129900501 USD 1,122,467,217.65 USDC 55,215,289.1233817 USTC 1,260.54344897418 XTZ 695,291.945724483 YFI 128.160239144428 ZEC 43,919.4737009613 ZRX 2,737,146.67279388†	
Reason: Asserted liabilities are duplicative of Gemini Master Claim.											
20	NAME REDACTED ADDRESS REDACTED	1222	Genesis Global Capital, LLC	12/6/2023*	MATIC 3,182.217766 RLY 53,369.8541 ETH 5 LUNA 5 PEPE 5 SLP 5 USD 3,706.06	NAME REDACTED ADDRESS REDACTED	356	Genesis Global Capital, LLC	05/22/23	IINCH 3,012,033.46333801 AAVE 33,788.9425230479 ALCX 8,676.38998201275 AMP 425.936,380.55768 ANKR 23,335,928.0678024 APE 1,139,985.53964617 AXS 90,870.9278787395 BAL 34,868.7609066813 BAT 9,388,882.97197886 BCH 44,121.774231399 BNT 267,993.780189926 BTC 15,094.3806124709 CHZ 688,964.618297403 COMP 14,038.7643541652 CRV 3,110,821.20254412 DAI 8,326,580.27023902 DOGE 195,432,319.002998 ETH 157,019.767022979 FET 2,013,560.72967566 FIL 2,601,610.12844771 FTM 21,093,013.7169699 GRT 17,337,624.765759 GUSD 375,437,385.038869 INJ 135,922.613140235 KNC 434,572.643810026 LINK 1,524,285.66444107  LPT 24,673.1466099058 LRC 2,690,498.81970212 LTC 127,209.281884632 MANA 5,593,977.33440294 MATIC 16,964,467.2401572 MKR 1,338.38038533215 OXT 3,699,739.25944469 PAXG 1,014.97374057132 RBN 25,405.5734626778 REN 4,231,486.62614094 RLY 5,660,470.4301708 SKL 3,980,478.77162429 SNX 237,906.952970567 SOL 284,128.92393429 STORJ 1,811,065.26135581 SUSHI 597,029.850730662 TOKE 24,563.5645986667 UMA 60,303.1821763762 UNI 511,292.129900501 USD 1,122,467,217.65 USDC 55,215,289.1233817 USTC 1,260.54344897418 XTZ 695,291.945724483 YFI 128.160239144428 ZEC 43,919.4737009613 ZRX 2,737,146.67279388†	
Reason: Asserted liabilities are duplicative of Gemini Master Claim.											
21	NAME REDACTED ADDRESS REDACTED	1224	Genesis Asia Pacific Pte. Ltd. (Singapore)	12/7/2023*	DOGE 130,295.55 LTC 5.761 USD 130,295.55	NAME REDACTED ADDRESS REDACTED	356	Genesis Global Capital, LLC	05/22/23	IINCH 3,012,033.46333801 AAVE 33,788.9425230479 ALCX 8,676.38998201275 AMP 425.936,380.55768 ANKR 23,335,928.0678024 APE 1,139,985.53964617 AXS 90,870.9278787395 BAL 34,868.7609066813 BAT 9,388,882.97197886 BCH 44,121.774231399 BNT 267,993.780189926 BTC 15,094.3806124709 CHZ 688,964.618297403 COMP 14,038.7643541652 CRV 3,110,821.20254412 DAI 8,326,580.27023902 DOGE 195,432,319.002998 ETH 157,019.767022979 FET 2,013,560.72967566 FIL 2,601,610.12844771 FTM 21,093,013.7169699 GRT 17,337,624.765759 GUSD 375,437,385.038869 INJ 135,922.613140235 KNC 434,572.643810026 LINK 1,524,285.66444107  LPT 24,673.1466099058 LRC 2,690,498.81970212 LTC 127,209.281884632 MANA 5,593,977.33440294 MATIC 16,964,467.2401572 MKR 1,338.38038533215 OXT 3,699,739.25944469 PAXG 1,014.97374057132 RBN 25,405.5734626778 REN 4,231,486.62614094 RLY 5,660,470.4301708 SKL 3,980,478.77162429 SNX 237,906.952970567 SOL 284,128.92393429 STORJ 1,811,065.26135581 SUSHI 597,029.850730662 TOKE 24,563.5645986667 UMA 60,303.1821763762 UNI 511,292.129900501 USD 1,122,467,217.65 USDC 55,215,289.1233817 USTC 1,260.54344897418 XTZ 695,291.945724483 YFI 128.160239144428 ZEC 43,919.4737009613 ZRX 2,737,146.67279388†	
Reason: Asserted liabilities are duplicative of Gemini Master Claim.											

†Indicates claim contains unliquidated and/or undetermined amounts

\*Claim was filed after the General Bar Date

Genesis Global Holdco, LLC Case No. 23-10063  
Fifteenth Omnibus Objection  
Exhibit 1 - Gemini Earn Duplicate

CLAIMS TO BE DISALLOWED						SURVIVING CLAIMS					
#	NAME & ADDRESS	CLAIM #	ASSERTED DEBTOR	DATE FILED	TOTAL ASSERTED IN KIND AMOUNT	NAME & ADDRESS	CLAIM #	REMAINING DEBTOR	DATE FILED	TOTAL REMAINING IN KIND AMOUNT	
22	NAME REDACTED ADDRESS REDACTED	1237	Genesis Global Holdco, LLC	12/10/2023*	USD 5,472.37	NAME REDACTED ADDRESS REDACTED	356	Genesis Global Capital, LLC	05/22/23	IINCH 3,012,033.46333801 AAVE 33,788.9425230479 ALCX 8,676.38998201275 AMP 425.936,380.55768 ANKR 23,335,928.0678024 APE 1,139,985.53964617 AXS 90,870.9278787395 BAL 34,868.7609066813 BAT 9,388,882.97197886 BCH 44,121.774231399 BNT 267,993.780189926 BTC 15,094.3806124709 CHZ 688,964.618297403 COMP 14,038.7643541652 CRV 3,110,821.20254412 DAI 8,326,580.27023902 DOGE 195,432,319.002998 ETH 157,019.767022979 FET 2,013,560.72967566 FIL 2,601,610.12844771 FTM 21,093,013.7169699 GRT 17,337,624.765759 GUSD 375,437,385.038869 INJ 135,922.613140235 KNC 434,572.643810026 LINK 1,524,285.66444107  LPT 24,673.1466099058 LRC 2,690,498.81970212 LTC 127,209.281884632 MANA 5,593,977.33440294 MATIC 16,964,467.2401572 MKR 1,338.38038533215 OXT 3,699,739.25944469 PAXG 1,014.97374057132 RBN 25,405.5734626778 REN 4,231,486.62614094 RLY 5,660,470.4301708 SKL 3,980,478.77162429 SNX 237,906.952970567 SOL 284,128.92393429 STORJ 1,811,065.26135581 SUSHI 597,029.850730662 TOKE 24,563.5645986667 UMA 60,303.1821763762 UNI 511,292.129900501 USD 1,122,467,217.65 USDC 55,215,289.1233817 USTC 1,260.54344897418 XTZ 695,291.945724483 YFI 128.160239144428 ZEC 43,919.4737009613 ZRX 2,737,146.67279388†	
Reason: Asserted liabilities are duplicative of Gemini Master Claim.											
23	NAME REDACTED ADDRESS REDACTED	385	Genesis Global Capital, LLC	05/20/23	IINCH 1,347,947148 BTC 4.42993291 LINK 99.644856 SOL 18.023811 ETH 4.137064 FTM 457.067033 FET 11,112.057045 GUSD 168,719.02†	NAME REDACTED ADDRESS REDACTED	356	Genesis Global Capital, LLC	05/22/23	IINCH 3,012,033.46333801 AAVE 33,788.9425230479 ALCX 8,676.38998201275 AMP 425.936,380.55768 ANKR 23,335,928.0678024 APE 1,139,985.53964617 AXS 90,870.9278787395 BAL 34,868.7609066813 BAT 9,388,882.97197886 BCH 44,121.774231399 BNT 267,993.780189926 BTC 15,094.3806124709 CHZ 688,964.618297403 COMP 14,038.7643541652 CRV 3,110,821.20254412 DAI 8,326,580.27023902 DOGE 195,432,319.002998 ETH 157,019.767022979 FET 2,013,560.72967566 FIL 2,601,610.12844771 FTM 21,093,013.7169699 GRT 17,337,624.765759 GUSD 375,437,385.038869 INJ 135,922.613140235 KNC 434,572.643810026 LINK 1,524,285.66444107  LPT 24,673.1466099058 LRC 2,690,498.81970212 LTC 127,209.281884632 MANA 5,593,977.33440294 MATIC 16,964,467.2401572 MKR 1,338.38038533215 OXT 3,699,739.25944469 PAXG 1,014.97374057132 RBN 25,405.5734626778 REN 4,231,486.62614094 RLY 5,660,470.4301708 SKL 3,980,478.77162429 SNX 237,906.952970567 SOL 284,128.92393429 STORJ 1,811,065.26135581 SUSHI 597,029.850730662 TOKE 24,563.5645986667 UMA 60,303.1821763762 UNI 511,292.129900501 USD 1,122,467,217.65 USDC 55,215,289.1233817 USTC 1,260.54344897418 XTZ 695,291.945724483 YFI 128.160239144428 ZEC 43,919.4737009613 ZRX 2,737,146.67279388†	
Reason: Asserted liabilities are duplicative of Gemini Master Claim.											
24	NAME REDACTED ADDRESS REDACTED	1223	Genesis Global Holdco, LLC	12/6/2023*	BTC 0.0002185 SOL 0.00124051 USDC 63,518.328373 USD 63,518.32	NAME REDACTED ADDRESS REDACTED	356	Genesis Global Capital, LLC	05/22/23	IINCH 3,012,033.46333801 AAVE 33,788.9425230479 ALCX 8,676.38998201275 AMP 425.936,380.55768 ANKR 23,335,928.0678024 APE 1,139,985.53964617 AXS 90,870.9278787395 BAL 34,868.7609066813 BAT 9,388,882.97197886 BCH 44,121.774231399 BNT 267,993.780189926 BTC 15,094.3806124709 CHZ 688,964.618297403 COMP 14,038.7643541652 CRV 3,110,821.20254412 DAI 8,326,580.27023902 DOGE 195,432,319.002998 ETH 157,019.767022979 FET 2,013,560.72967566 FIL 2,601,610.12844771 FTM 21,093,013.7169699 GRT 17,337,624.765759 GUSD 375,437,385.038869 INJ 135,922.613140235 KNC 434,572.643810026 LINK 1,524,285.66444107  LPT 24,673.1466099058 LRC 2,690,498.81970212 LTC 127,209.281884632 MANA 5,593,977.33440294 MATIC 16,964,467.2401572 MKR 1,338.38038533215 OXT 3,699,739.25944469 PAXG 1,014.97374057132 RBN 25,405.5734626778 REN 4,231,486.62614094 RLY 5,660,470.4301708 SKL 3,980,478.77162429 SNX 237,906.952970567 SOL 284,128.92393429 STORJ 1,811,065.26135581 SUSHI 597,029.850730662 TOKE 24,563.5645986667 UMA 60,303.1821763762 UNI 511,292.129900501 USD 1,122,467,217.65 USDC 55,215,289.1233817 USTC 1,260.54344897418 XTZ 695,291.945724483 YFI 128.160239144428 ZEC 43,919.4737009613 ZRX 2,737,146.67279388†	
Reason: Asserted liabilities are duplicative of Gemini Master Claim.											

†Indicates claim contains unliquidated and/or undetermined amounts

\*Claim was filed after the General Bar Date

Genesis Global Holdco, LLC Case No. 23-10063  
Fifteenth Omnibus Objection  
Exhibit 1 - Gemini Earn Duplicate

CLAIMS TO BE DISALLOWED						SURVIVING CLAIMS					
#	NAME & ADDRESS	CLAIM #	ASSERTED DEBTOR	DATE FILED	TOTAL ASSERTED IN KIND AMOUNT	NAME & ADDRESS	CLAIM #	REMAINING DEBTOR	DATE FILED	TOTAL REMAINING IN KIND AMOUNT	
25	NAME REDACTED ADDRESS REDACTED	1200	Genesis Global Capital, LLC	11/28/2023*	BCH 0.81786463 BTC 0.05857723 DOGE 99.84050936 ETH 0.4938026 LTC 0.81786463 USD 1,797	NAME REDACTED ADDRESS REDACTED	356	Genesis Global Capital, LLC	05/22/23	IINCH 3,012,033.46333801 AAVE 33,788.9425230479 ALCX 8,676.38998201275 AMP 425.936,380.55768 ANKR 23,335,928.0678024 APE 1,139,985.53964617 AXS 90,870.9278787395 BAL 34,868.7609066813 BAT 9,388,882.97197886 BCH 44,121.774231399 BNT 267,993.780189926 BTC 15,094.3806124709 CHZ 688,964.618297403 COMP 14,038.7643541652 CRV 3,110,821.20254412 DAI 8,326,580.27023902 DOGE 195,432,319.002998 ETH 157,019.767022979 FET 2,013,560.72967566 FIL 2,601,610.12844771 FTM 21,093.013.7169699 GRT 17,337,624.765759 GUSD 375,437,385.038869 INJ 135,922.613140235 KNC 434,572.643810026 LINK 1,524,285.66444107	LPT 24,673.1466099058 LRC 2,690,498.81970212 LTC 127,209.281884632 MANA 5,593,977.33440294 MATIC 16,964,467.2401572 MKR 1,338.38038533215 OXT 3,699,739.25944469 PAXG 1,014,97374057132 RBN 25,405.5734626778 REN 4,231,486.62614094 RLY 5,660,470.4301708 SKL 3,980,478.77162429 SNX 237,906.952970567 SOL 284,128.92393429 STORJ 1,811,065.26135581 SUSHI 597,029.850730662 TOKE 24,563.5645986667 UMA 60,303.1821763762 UNI 511,292.129900501 USD 1,122,467.217.65 USDC 55,215,289.1233817 USTC 1,260.54344897418 XTZ 695,291.945724483 YFI 128.160239144428 ZEC 43,919.4737009613 ZRX 2,737,146.67279388†
Reason: Asserted liabilities are duplicative of Gemini Master Claim.											
26	NAME REDACTED ADDRESS REDACTED	1202	Genesis Global Holdco, LLC	11/29/2023*	BTC 0.04879552†	NAME REDACTED ADDRESS REDACTED	356	Genesis Global Capital, LLC	05/22/23	IINCH 3,012,033.46333801 AAVE 33,788.9425230479 ALCX 8,676.38998201275 AMP 425.936,380.55768 ANKR 23,335,928.0678024 APE 1,139,985.53964617 AXS 90,870.9278787395 BAL 34,868.7609066813 BAT 9,388,882.97197886 BCH 44,121.774231399 BNT 267,993.780189926 BTC 15,094.3806124709 CHZ 688,964.618297403 COMP 14,038.7643541652 CRV 3,110,821.20254412 DAI 8,326,580.27023902 DOGE 195,432,319.002998 ETH 157,019.767022979 FET 2,013,560.72967566 FIL 2,601,610.12844771 FTM 21,093.013.7169699 GRT 17,337,624.765759 GUSD 375,437,385.038869 INJ 135,922.613140235 KNC 434,572.643810026 LINK 1,524,285.66444107	LPT 24,673.1466099058 LRC 2,690,498.81970212 LTC 127,209.281884632 MANA 5,593,977.33440294 MATIC 16,964,467.2401572 MKR 1,338.38038533215 OXT 3,699,739.25944469 PAXG 1,014,97374057132 RBN 25,405.5734626778 REN 4,231,486.62614094 RLY 5,660,470.4301708 SKL 3,980,478.77162429 SNX 237,906.952970567 SOL 284,128.92393429 STORJ 1,811,065.26135581 SUSHI 597,029.850730662 TOKE 24,563.5645986667 UMA 60,303.1821763762 UNI 511,292.129900501 USD 1,122,467.217.65 USDC 55,215,289.1233817 USTC 1,260.54344897418 XTZ 695,291.945724483 YFI 128.160239144428 ZEC 43,919.4737009613 ZRX 2,737,146.67279388†
Reason: Asserted liabilities are duplicative of Gemini Master Claim.											
27	NAME REDACTED ADDRESS REDACTED	1238	Genesis Global Capital, LLC	12/10/2023*	GUSD 800 USD 800	NAME REDACTED ADDRESS REDACTED	356	Genesis Global Capital, LLC	05/22/23	IINCH 3,012,033.46333801 AAVE 33,788.9425230479 ALCX 8,676.38998201275 AMP 425.936,380.55768 ANKR 23,335,928.0678024 APE 1,139,985.53964617 AXS 90,870.9278787395 BAL 34,868.7609066813 BAT 9,388,882.97197886 BCH 44,121.774231399 BNT 267,993.780189926 BTC 15,094.3806124709 CHZ 688,964.618297403 COMP 14,038.7643541652 CRV 3,110,821.20254412 DAI 8,326,580.27023902 DOGE 195,432,319.002998 ETH 157,019.767022979 FET 2,013,560.72967566 FIL 2,601,610.12844771 FTM 21,093.013.7169699 GRT 17,337,624.765759 GUSD 375,437,385.038869 INJ 135,922.613140235 KNC 434,572.643810026 LINK 1,524,285.66444107	LPT 24,673.1466099058 LRC 2,690,498.81970212 LTC 127,209.281884632 MANA 5,593,977.33440294 MATIC 16,964,467.2401572 MKR 1,338.38038533215 OXT 3,699,739.25944469 PAXG 1,014,97374057132 RBN 25,405.5734626778 REN 4,231,486.62614094 RLY 5,660,470.4301708 SKL 3,980,478.77162429 SNX 237,906.952970567 SOL 284,128.92393429 STORJ 1,811,065.26135581 SUSHI 597,029.850730662 TOKE 24,563.5645986667 UMA 60,303.1821763762 UNI 511,292.129900501 USD 1,122,467.217.65 USDC 55,215,289.1233817 USTC 1,260.54344897418 XTZ 695,291.945724483 YFI 128.160239144428 ZEC 43,919.4737009613 ZRX 2,737,146.67279388†
Reason: Asserted liabilities are duplicative of Gemini Master Claim.											

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CLAIMS TO BE DISALLOWED						SURVIVING CLAIMS					
#	NAME & ADDRESS	CLAIM #	ASSERTED DEBTOR	DATE FILED	TOTAL ASSERTED IN KIND AMOUNT	NAME & ADDRESS	CLAIM #	REMAINING DEBTOR	DATE FILED	TOTAL REMAINING IN KIND AMOUNT	
28	NAME REDACTED ADDRESS REDACTED	1198	Genesis Global Holdco, LLC	11/23/2023*	USD 3,000	NAME REDACTED ADDRESS REDACTED	356	Genesis Global Capital, LLC	05/22/23	IINCH 3,012,033.46333801 AAVE 33,788.9425230479 ALCX 8,676.38998201275 AMP 425,936.380.55768 ANKR 23,335,928.0678024 APE 1,139,985.53964617 AXS 90,870.9278787395 BAL 34,868.7609066813 BAT 9,388,882.97197886 BCH 44,121.774231399 BNT 267,993.780189926 BTC 15,094.3806124709 CHZ 688,964.618297403 COMP 14,038.7643541652 CRV 3,110,821.20254412 DAI 8,326,580.27023902 DOGE 195,432,319.002998 ETH 157,019.767022979 FET 2,013,560.72967566 FIL 2,601,610.12844771 FTM 21,093,013.7169699 GRT 17,337,624.765759 GUSD 375,437,385.038869 INJ 135,922.613140235 KNC 434,572.643810026 LINK 1,524,285.66444107  LPT 24,673.1466099058 LRC 2,690,498.81970212 LTC 127,209.281884632 MANA 5,593,977.33440294 MATIC 16,964,467.2401572 MKR 1,338.38038533215 OXT 3,699,739.25944469 PAXG 1,014.97374057132 RBN 25,405.5734626778 REN 4,231,486.62614094 RLY 5,660,470.4301708 SKL 3,980,478.77162429 SNX 237,906.952970567 SOL 284,128.92393429 STORJ 1,811,065.26135581 SUSHI 597,029.850730662 TOKE 24,563.5645986667 UMA 60,303.1821763762 UNI 511,292.129900501 USD 1,122,467,217.65 USDC 55,215,289.1233817 USTC 1,260.54344897418 XTZ 695,291.945724483 YFI 128.160239144428 ZEC 43,919.4737009613 ZRX 2,737,146.67279388†	
Reason: Asserted liabilities are duplicative of Gemini Master Claim.											
29	NAME REDACTED ADDRESS REDACTED	1231	Genesis Global Holdco, LLC	12/10/2023*	IINCH 1,000,000 AAVE 1,000,000 ADA 1,000,000 ALCX 1,000,000 ALGO 1,000,000 AMP 1,000,000 ANKR 1,000,000 APE 1,000,000 ATOM 1,000,000 AXS 1,000,000 BAL 1,000,000 BAT 1,000,000 BCH 1,000,000 BiDAO 1,000,000 BNB 1,000,000 BNT 1,000,000 BSV 1,000,000 BTC 1,000,000 CHZ 1,000,000 COMP 1,000,000 CRV 1,000,000 CVC 1,000,000 DAI 1,000,000 DOGE 1,000,000 DOT 1,000,000 ELON 1,000,000 ENJ 1,000,000 EOS 1,000,000 ETC 1,000,000 ETH 1,000,000  ETHW 1,000,000 FET 1,000,000 FIL 1,000,000 FLR 1,000,000 FLOW 1,000,000 FTM 1,000,000 GLMR 1,000,000 GRT 1,000,000 GUSD 1,000,000 HNT 1,000,000 INJ 1,000,000 KNC 1,000,000 KSM 1,000,000 LINK 1,000,000 LPT 1,000,000 LRC 1,000,000 LTC 1,000,000 LUNC 1,000,000 MANA 1,000,000 MATIC 1,000,000 MC 1,000,000 MKR 1,000,000 NEAR 1,000,000 NEO 1,000,000 NMR 1,000,000 OXT 1,000,000 PAXG 1,000,000 RBN 1,000,000 REN 1,000,000 RLY 1,000,000  ETHW 1,000,000 FET 1,000,000 FIL 1,000,000 FLR 1,000,000 FLOW 1,000,000 FTM 1,000,000 GLMR 1,000,000 GRT 1,000,000 GUSD 1,000,000 HNT 1,000,000 INJ 1,000,000 KNC 1,000,000 KSM 1,000,000 LINK 1,000,000 LPT 1,000,000 LRC 1,000,000 LTC 1,000,000 LUNC 1,000,000 MANA 1,000,000 MATIC 1,000,000 MC 1,000,000 MKR 1,000,000 NEAR 1,000,000 NEO 1,000,000 NMR 1,000,000 OXT 1,000,000 PAXG 1,000,000 RBN 1,000,000 REN 1,000,000 RLY 1,000,000  SAND 1,000,000 SHIB 1,000,000 SKL 1,000,000 SLP 1,000,000 SNX 1,000,000 SOL 1,000,000 SPELL 1,000,000 SRM 1,000,000 STORJ 1,000,000 SUSHI 1,000,000 TOKE 1,000,000 TRX 1,000,000 UMA 1,000,000 UNI 1,000,000 USD 1,001,000,000 USDC 1,000,000 USDT 1,000,000 USTC 1,000,000 WBTC 1,000,000 WCFG 1,000,000 WLUNA 1,000,000 XLM 1,000,000 XRP 1,000,000 XTZ 1,000,000 YFI 1,000,000 ZEC 1,000,000 ZEN 1,000,000 ZRX 1,000,000	NAME REDACTED ADDRESS REDACTED	356	Genesis Global Capital, LLC	05/22/23	IINCH 3,012,033.46333801 AAVE 33,788.9425230479 ALCX 8,676.38998201275 AMP 425,936.380.55768 ANKR 23,335,928.0678024 APE 1,139,985.53964617 AXS 90,870.9278787395 BAL 34,868.7609066813 BAT 9,388,882.97197886 BCH 44,121.774231399 BNT 267,993.780189926 BTC 15,094.3806124709 CHZ 688,964.618297403 COMP 14,038.7643541652 CRV 3,110,821.20254412 DAI 8,326,580.27023902 DOGE 195,432,319.002998 ETH 157,019.767022979 FET 2,013,560.72967566 FIL 2,601,610.12844771 FTM 21,093,013.7169699 GRT 17,337,624.765759 GUSD 375,437,385.038869 INJ 135,922.613140235 KNC 434,572.643810026 LINK 1,524,285.66444107  LPT 24,673.1466099058 LRC 2,690,498.81970212 LTC 127,209.281884632 MANA 5,593,977.33440294 MATIC 16,964,467.2401572 MKR 1,338.38038533215 OXT 3,699,739.25944469 PAXG 1,014.97374057132 RBN 25,405.5734626778 REN 4,231,486.62614094 RLY 5,660,470.4301708 SKL 3,980,478.77162429 SNX 237,906.952970567 SOL 284,128.92393429 STORJ 1,811,065.26135581 SUSHI 597,029.850730662 TOKE 24,563.5645986667 UMA 60,303.1821763762 UNI 511,292.129900501 USD 1,122,467,217.65 USDC 55,215,289.1233817 USTC 1,260.54344897418 XTZ 695,291.945724483 YFI 128.160239144428 ZEC 43,919.4737009613 ZRX 2,737,146.67279388†	
Reason: Asserted liabilities are duplicative of Gemini Master Claim.											
30	NAME REDACTED ADDRESS REDACTED	1193	Genesis Global Holdco, LLC	11/21/2023*	BTC 0.25941461 USD 10,000	NAME REDACTED ADDRESS REDACTED	356	Genesis Global Capital, LLC	05/22/23	IINCH 3,012,033.46333801 AAVE 33,788.9425230479 ALCX 8,676.38998201275 AMP 425,936.380.55768 ANKR 23,335,928.0678024 APE 1,139,985.53964617 AXS 90,870.9278787395 BAL 34,868.7609066813 BAT 9,388,882.97197886 BCH 44,121.774231399 BNT 267,993.780189926 BTC 15,094.3806124709 CHZ 688,964.618297403 COMP 14,038.7643541652 CRV 3,110,821.20254412 DAI 8,326,580.27023902 DOGE 195,432,319.002998 ETH 157,019.767022979 FET 2,013,560.72967566 FIL 2,601,610.12844771 FTM 21,093,013.7169699 GRT 17,337,624.765759 GUSD 375,437,385.038869 INJ 135,922.613140235 KNC 434,572.643810026 LINK 1,524,285.66444107  LPT 24,673.1466099058 LRC 2,690,498.81970212 LTC 127,209.281884632 MANA 5,593,977.33440294 MATIC 16,964,467.2401572 MKR 1,338.38038533215 OXT 3,699,739.25944469 PAXG 1,014.97374057132 RBN 25,405.5734626778 REN 4,231,486.62614094 RLY 5,660,470.4301708 SKL 3,980,478.77162429 SNX 237,906.952970567 SOL 284,128.92393429 STORJ 1,811,065.26135581 SUSHI 597,029.850730662 TOKE 24,563.5645986667 UMA 60,303.1821763762 UNI 511,292.129900501 USD 1,122,467,217.65 USDC 55,215,289.1233817 USTC 1,260.54344897418 XTZ 695,291.945724483 YFI 128.160239144428 ZEC 43,919.4737009613 ZRX 2,737,146.67279388†	
Reason: Asserted liabilities are duplicative of Gemini Master Claim.											

†Indicates claim contains unliquidated and/or undetermined amounts  
\*Claim was filed after the General Bar Date

Genesis Global Holdco, LLC Case No. 23-10063  
Fifteenth Omnibus Objection  
Exhibit 1 - Gemini Earn Duplicate

CLAIMS TO BE DISALLOWED					SURVIVING CLAIMS					
#	NAME & ADDRESS	CLAIM #	ASSERTED DEBTOR	DATE FILED	TOTAL ASSERTED IN KIND AMOUNT	NAME & ADDRESS	CLAIM #	REMAINING DEBTOR	DATE FILED	TOTAL REMAINING IN KIND AMOUNT
31	NAME REDACTED ADDRESS REDACTED	1209	Genesis Global Holdco, LLC	12/4/2023*	ANKR 607.235997 BTC 0.38628464 USD 16,096.74	NAME REDACTED ADDRESS REDACTED	356	Genesis Global Capital, LLC	05/22/23	IINCH 3,012,033.46333801 AAVE 33,788.9425230479 ALCX 8,676.38998201275 AMP 425.936.380.55768 ANKR 23,335,928.0678024 APE 1,139,985.53964617 AXS 90,870.9278787395 BAL 34,868.7609066813 BAT 9,388,882.97197886 BCH 44,121.774231399 BNT 267,993.780189926 BTC 15,094.3806124709 CHZ 688,964.618297403 COMP 14,038.7643541652 CRV 3,110,821.20254412 DAI 8,326,580.27023902 DOGE 195,432,319.002998 ETH 157,019.767022979 FET 2,013,560.72967566 FIL 2,601,610.12844771 FTM 21,093.013.7169699 GRT 17,337,624.765759 GUSD 375,437,385.038869 INJ 135,922.613140235 KNC 434,572.643810026 LINK 1,524,285.66444107 LPT 24,673.1466099058 LRC 2,690,498.81970212 LTC 127,209.281884632 MANA 5,593,977.33440294 MATIC 16,964,467.2401572 MKR 1,338.38038533215 OXT 3,699,739.25944469 PAXG 1,014.97374057132 RBN 25,405.5734626778 REN 4,231,486.62614094 RLY 5,660,470.4301708 SKL 3,980,478.77162429 SNX 237,906.952970567 SOL 284,128.92393429 STORJ 1,811,065.26135581 SUSHI 597,029.850730662 TOKE 24,563.5645986667 UMA 60,303.1821763762 UNI 511,292.129900501 USD 1,122,467,217.65 USDC 55,215,289.1233817 USTC 1,260.54344897418 XTZ 695,291.945724483 YFI 128.160239144428 ZEC 43,919.4737009613 ZRX 2,737,146.67279388†
Reason: Asserted liabilities are duplicative of Gemini Master Claim.										
32	NAME REDACTED ADDRESS REDACTED	1210	Genesis Global Holdco, LLC	12/1/2023*	ZRX 476 AAVE 288 AXS 0.39 MATIC 949 BTC 0.019 REN 659 COMP 330 ETH 1.26 GRT 288 SAND 0.22 UNI 136 ZEC 11.8 USD 6,000	NAME REDACTED ADDRESS REDACTED	356	Genesis Global Capital, LLC	05/22/23	IINCH 3,012,033.46333801 AAVE 33,788.9425230479 ALCX 8,676.38998201275 AMP 425.936.380.55768 ANKR 23,335,928.0678024 APE 1,139,985.53964617 AXS 90,870.9278787395 BAL 34,868.7609066813 BAT 9,388,882.97197886 BCH 44,121.774231399 BNT 267,993.780189926 BTC 15,094.3806124709 CHZ 688,964.618297403 COMP 14,038.7643541652 CRV 3,110,821.20254412 DAI 8,326,580.27023902 DOGE 195,432,319.002998 ETH 157,019.767022979 FET 2,013,560.72967566 FIL 2,601,610.12844771 FTM 21,093.013.7169699 GRT 17,337,624.765759 GUSD 375,437,385.038869 INJ 135,922.613140235 KNC 434,572.643810026 LINK 1,524,285.66444107 LPT 24,673.1466099058 LRC 2,690,498.81970212 LTC 127,209.281884632 MANA 5,593,977.33440294 MATIC 16,964,467.2401572 MKR 1,338.38038533215 OXT 3,699,739.25944469 PAXG 1,014.97374057132 RBN 25,405.5734626778 REN 4,231,486.62614094 RLY 5,660,470.4301708 SKL 3,980,478.77162429 SNX 237,906.952970567 SOL 284,128.92393429 STORJ 1,811,065.26135581 SUSHI 597,029.850730662 TOKE 24,563.5645986667 UMA 60,303.1821763762 UNI 511,292.129900501 USD 1,122,467,217.65 USDC 55,215,289.1233817 USTC 1,260.54344897418 XTZ 695,291.945724483 YFI 128.160239144428 ZEC 43,919.4737009613 ZRX 2,737,146.67279388†
Reason: Asserted liabilities are duplicative of Gemini Master Claim.										
33	NAME REDACTED ADDRESS REDACTED	1206	Genesis Global Capital, LLC	12/2/2023*	MATIC 1,913.865689 SPELL 82,720.088206 USD 2,000	NAME REDACTED ADDRESS REDACTED	356	Genesis Global Capital, LLC	05/22/23	IINCH 3,012,033.46333801 AAVE 33,788.9425230479 ALCX 8,676.38998201275 AMP 425.936.380.55768 ANKR 23,335,928.0678024 APE 1,139,985.53964617 AXS 90,870.9278787395 BAL 34,868.7609066813 BAT 9,388,882.97197886 BCH 44,121.774231399 BNT 267,993.780189926 BTC 15,094.3806124709 CHZ 688,964.618297403 COMP 14,038.7643541652 CRV 3,110,821.20254412 DAI 8,326,580.27023902 DOGE 195,432,319.002998 ETH 157,019.767022979 FET 2,013,560.72967566 FIL 2,601,610.12844771 FTM 21,093.013.7169699 GRT 17,337,624.765759 GUSD 375,437,385.038869 INJ 135,922.613140235 KNC 434,572.643810026 LINK 1,524,285.66444107 LPT 24,673.1466099058 LRC 2,690,498.81970212 LTC 127,209.281884632 MANA 5,593,977.33440294 MATIC 16,964,467.2401572 MKR 1,338.38038533215 OXT 3,699,739.25944469 PAXG 1,014.97374057132 RBN 25,405.5734626778 REN 4,231,486.62614094 RLY 5,660,470.4301708 SKL 3,980,478.77162429 SNX 237,906.952970567 SOL 284,128.92393429 STORJ 1,811,065.26135581 SUSHI 597,029.850730662 TOKE 24,563.5645986667 UMA 60,303.1821763762 UNI 511,292.129900501 USD 1,122,467,217.65 USDC 55,215,289.1233817 USTC 1,260.54344897418 XTZ 695,291.945724483 YFI 128.160239144428 ZEC 43,919.4737009613 ZRX 2,737,146.67279388†
Reason: Asserted liabilities are duplicative of Gemini Master Claim.										

†Indicates claim contains unliquidated and/or undetermined amounts

\*Claim was filed after the General Bar Date

Genesis Global Holdco, LLC Case No. 23-10063  
Fifteenth Omnibus Objection  
Exhibit 1 - Gemini Earn Duplicate

CLAIMS TO BE DISALLOWED						SURVIVING CLAIMS					
#	NAME & ADDRESS	CLAIM #	ASSERTED DEBTOR	DATE FILED	TOTAL ASSERTED IN KIND AMOUNT	NAME & ADDRESS	CLAIM #	REMAINING DEBTOR	DATE FILED	TOTAL REMAINING IN KIND AMOUNT	
34	NAME REDACTED ADDRESS REDACTED	1233	Genesis Global Holdco, LLC	12/8/2023*	ETH 2.67131311 USD 6,280.89	NAME REDACTED ADDRESS REDACTED	356	Genesis Global Capital, LLC	05/22/23	1INCH 3,012,033.46333801 LPT 24.673.1466099058 AAVE 33,788.9425230479 LRC 2,690.498.81970212 ALCX 8,676.38998201275 LTC 127,209.281884632 AMP 425.936.380.55768 MANA 5.593.977.33440294 ANKR 23,335.928.0678024 MATIC 16.964.467.2401572 APE 1,139.985.53964617 MKR 1,338.38038533215 AXS 90,870.9278787395 OXT 3,699.739.25944469 BAL 34,868.7609066813 PAXG 1,014.97374057132 BAT 9,388.882.97197886 RBN 25,405.5734626778 BCH 44,121.774231399 REN 4,231.486.62614094 BNT 267,993.780189926 RLY 5,660.470.4301708 BTC 15,094.3806124709 SKL 3,980.478.77162429 CHZ 688,964.618297403 SNX 237,906.952970567 COMP 14,038.7643541652 SOL 284,128.92393429 CRV 3,110.821.20254412 STORJ 1,811,065.26135581 DAI 8,326.580.27023902 SUSHI 597,029.850730662 DOGE 195,432,319.002998 TOKE 24,563.5645986667 ETH 157,019.767022979 UMA 60,303.1821763762 FET 2,013,560.72967566 UNI 511,292.129900501 FIL 2,601,610.12844771 USD 1,122,467.217.65 FTM 21,093.013.7169699 USDC 55,215.289.1233817 GRT 17,337,624.765759 USTC 1,260.54344897418 GUSD 375,437,385.038869 XTZ 695,291.945724483 INJ 135,922.613140235 YFI 128.160239144428 KNC 434,572.643810026 ZEC 43,919.4737009613 LINK 1,524,285.66444107 ZRX 2,737,146.67279388†	
Reason: Asserted liabilities are duplicative of Gemini Master Claim.											
35	NAME REDACTED ADDRESS REDACTED	1235	Genesis Global Holdco, LLC	12/9/2023*	MATIC 1,108 STORJ 351.55 FIL 23.92 UNI 43.89 USD 3,000	NAME REDACTED ADDRESS REDACTED	356	Genesis Global Capital, LLC	05/22/23	1INCH 3,012,033.46333801 LPT 24.673.1466099058 AAVE 33,788.9425230479 LRC 2,690.498.81970212 ALCX 8,676.38998201275 LTC 127,209.281884632 AMP 425.936.380.55768 MANA 5.593.977.33440294 ANKR 23,335.928.0678024 MATIC 16.964.467.2401572 APE 1,139.985.53964617 MKR 1,338.38038533215 AXS 90,870.9278787395 OXT 3,699.739.25944469 BAL 34,868.7609066813 PAXG 1,014.97374057132 BAT 9,388.882.97197886 RBN 25,405.5734626778 BCH 44,121.774231399 REN 4,231.486.62614094 BNT 267,993.780189926 RLY 5,660.470.4301708 BTC 15,094.3806124709 SKL 3,980.478.77162429 CHZ 688,964.618297403 SNX 237,906.952970567 COMP 14,038.7643541652 SOL 284,128.92393429 CRV 3,110.821.20254412 STORJ 1,811,065.26135581 DAI 8,326.580.27023902 SUSHI 597,029.850730662 DOGE 195,432,319.002998 TOKE 24,563.5645986667 ETH 157,019.767022979 UMA 60,303.1821763762 FET 2,013,560.72967566 UNI 511,292.129900501 FIL 2,601,610.12844771 USD 1,122,467.217.65 FTM 21,093.013.7169699 USDC 55,215.289.1233817 GRT 17,337,624.765759 USTC 1,260.54344897418 GUSD 375,437,385.038869 XTZ 695,291.945724483 INJ 135,922.613140235 YFI 128.160239144428 KNC 434,572.643810026 ZEC 43,919.4737009613 LINK 1,524,285.66444107 ZRX 2,737,146.67279388†	
Reason: Asserted liabilities are duplicative of Gemini Master Claim.											
36	NAME REDACTED ADDRESS REDACTED	1192	Genesis Global Holdco, LLC	11/21/2023*	BTC 0.000891 DAI 20.2 DOGE 5,239.310789 GUSD 4 USD 475	NAME REDACTED ADDRESS REDACTED	356	Genesis Global Capital, LLC	05/22/23	1INCH 3,012,033.46333801 LPT 24.673.1466099058 AAVE 33,788.9425230479 LRC 2,690.498.81970212 ALCX 8,676.38998201275 LTC 127,209.281884632 AMP 425.936.380.55768 MANA 5.593.977.33440294 ANKR 23,335.928.0678024 MATIC 16.964.467.2401572 APE 1,139.985.53964617 MKR 1,338.38038533215 AXS 90,870.9278787395 OXT 3,699.739.25944469 BAL 34,868.7609066813 PAXG 1,014.97374057132 BAT 9,388.882.97197886 RBN 25,405.5734626778 BCH 44,121.774231399 REN 4,231.486.62614094 BNT 267,993.780189926 RLY 5,660.470.4301708 BTC 15,094.3806124709 SKL 3,980.478.77162429 CHZ 688,964.618297403 SNX 237,906.952970567 COMP 14,038.7643541652 SOL 284,128.92393429 CRV 3,110.821.20254412 STORJ 1,811,065.26135581 DAI 8,326.580.27023902 SUSHI 597,029.850730662 DOGE 195,432,319.002998 TOKE 24,563.5645986667 ETH 157,019.767022979 UMA 60,303.1821763762 FET 2,013,560.72967566 UNI 511,292.129900501 FIL 2,601,610.12844771 USD 1,122,467.217.65 FTM 21,093.013.7169699 USDC 55,215.289.1233817 GRT 17,337,624.765759 USTC 1,260.54344897418 GUSD 375,437,385.038869 XTZ 695,291.945724483 INJ 135,922.613140235 YFI 128.160239144428 KNC 434,572.643810026 ZEC 43,919.4737009613 LINK 1,524,285.66444107 ZRX 2,737,146.67279388†	
Reason: Asserted liabilities are duplicative of Gemini Master Claim.											

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Fifteenth Omnibus Objection  
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CLAIMS TO BE DISALLOWED						SURVIVING CLAIMS					
#	NAME & ADDRESS	CLAIM #	ASSERTED DEBTOR	DATE FILED	TOTAL ASSERTED IN KIND AMOUNT	NAME & ADDRESS	CLAIM #	REMAINING DEBTOR	DATE FILED	TOTAL REMAINING IN KIND AMOUNT	
37	NAME REDACTED ADDRESS REDACTED	1230	Genesis Global Holdco, LLC	12/8/2023*	LRC 341.58979591 ETH 3.02500855†	NAME REDACTED ADDRESS REDACTED	356	Genesis Global Capital, LLC	05/22/23	IINCH 3,012,033.46333801 AAVE 33,788.9425230479 ALCX 8,676.38998201275 AMP 425.936,380.55768 ANKR 23,335,928.0678024 APE 1,139,985.53964617 AXS 90,870.9278787395 BAL 34,868.7609066813 BAT 9,388,882.97197886 BCH 44,121.774231399 BNT 267,993.780189926 BTC 15,094.3806124709 CHZ 688,964.618297403 COMP 14,038.7643541652 CRV 3,110,821.20254412 DAI 8,326,580.27023902 DOGE 195,432,319.002998 ETH 157,019.767022979 FET 2,013,560.72967566 FIL 2,601,610.12844771 FTM 21,093,013.7169699 GRT 17,337,624.765759 GUSD 375,437,385.038869 INJ 135,922.613140235 KNC 434,572.643810026 LINK 1,524,285.66444107  LPT 24,673.1466099058 LRC 2,690,498.81970212 LTC 127,209.281884632 MANA 5,593,977.33440294 MATIC 16,964,467.2401572 MKR 1,338.38038533215 OXT 3,699,739.25944469 PAXG 1,014.97374057132 RBN 25,405.5734626778 REN 4,231,486.62614094 RLY 5,660,470.4301708 SKL 3,980,478.77162429 SNX 237,906.952970567 SOL 284,128.92393429 STORJ 1,811,065.26135581 SUSHI 597,029.850730662 TOKE 24,563.5645986667 UMA 60,303.1821763762 UNI 511,292.129900501 USD 1,122,467,217.65 USDC 55,215,289.1233817 USTC 1,260.54344897418 XTZ 695,291.945724483 YFI 128.160239144428 ZEC 43,919.4737009613 ZRX 2,737,146.67279388†	
Reason: Asserted liabilities are duplicative of Gemini Master Claim.											
38	NAME REDACTED ADDRESS REDACTED	1194	Genesis Global Holdco, LLC	11/21/2023*	BTC 0.00602509 ETH 0.085444 USD 405.3	NAME REDACTED ADDRESS REDACTED	356	Genesis Global Capital, LLC	05/22/23	IINCH 3,012,033.46333801 AAVE 33,788.9425230479 ALCX 8,676.38998201275 AMP 425.936,380.55768 ANKR 23,335,928.0678024 APE 1,139,985.53964617 AXS 90,870.9278787395 BAL 34,868.7609066813 BAT 9,388,882.97197886 BCH 44,121.774231399 BNT 267,993.780189926 BTC 15,094.3806124709 CHZ 688,964.618297403 COMP 14,038.7643541652 CRV 3,110,821.20254412 DAI 8,326,580.27023902 DOGE 195,432,319.002998 ETH 157,019.767022979 FET 2,013,560.72967566 FIL 2,601,610.12844771 FTM 21,093,013.7169699 GRT 17,337,624.765759 GUSD 375,437,385.038869 INJ 135,922.613140235 KNC 434,572.643810026 LINK 1,524,285.66444107  LPT 24,673.1466099058 LRC 2,690,498.81970212 LTC 127,209.281884632 MANA 5,593,977.33440294 MATIC 16,964,467.2401572 MKR 1,338.38038533215 OXT 3,699,739.25944469 PAXG 1,014.97374057132 RBN 25,405.5734626778 REN 4,231,486.62614094 RLY 5,660,470.4301708 SKL 3,980,478.77162429 SNX 237,906.952970567 SOL 284,128.92393429 STORJ 1,811,065.26135581 SUSHI 597,029.850730662 TOKE 24,563.5645986667 UMA 60,303.1821763762 UNI 511,292.129900501 USD 1,122,467,217.65 USDC 55,215,289.1233817 USTC 1,260.54344897418 XTZ 695,291.945724483 YFI 128.160239144428 ZEC 43,919.4737009613 ZRX 2,737,146.67279388†	
Reason: Asserted liabilities are duplicative of Gemini Master Claim.											
39	NAME REDACTED ADDRESS REDACTED	1197	Genesis Global Capital, LLC	11/23/2023*	AMP 9,005.186117 BTC 0.00015879 LINK 16.457848 MATIC 193.615853†	NAME REDACTED ADDRESS REDACTED	356	Genesis Global Capital, LLC	05/22/23	IINCH 3,012,033.46333801 AAVE 33,788.9425230479 ALCX 8,676.38998201275 AMP 425.936,380.55768 ANKR 23,335,928.0678024 APE 1,139,985.53964617 AXS 90,870.9278787395 BAL 34,868.7609066813 BAT 9,388,882.97197886 BCH 44,121.774231399 BNT 267,993.780189926 BTC 15,094.3806124709 CHZ 688,964.618297403 COMP 14,038.7643541652 CRV 3,110,821.20254412 DAI 8,326,580.27023902 DOGE 195,432,319.002998 ETH 157,019.767022979 FET 2,013,560.72967566 FIL 2,601,610.12844771 FTM 21,093,013.7169699 GRT 17,337,624.765759 GUSD 375,437,385.038869 INJ 135,922.613140235 KNC 434,572.643810026 LINK 1,524,285.66444107  LPT 24,673.1466099058 LRC 2,690,498.81970212 LTC 127,209.281884632 MANA 5,593,977.33440294 MATIC 16,964,467.2401572 MKR 1,338.38038533215 OXT 3,699,739.25944469 PAXG 1,014.97374057132 RBN 25,405.5734626778 REN 4,231,486.62614094 RLY 5,660,470.4301708 SKL 3,980,478.77162429 SNX 237,906.952970567 SOL 284,128.92393429 STORJ 1,811,065.26135581 SUSHI 597,029.850730662 TOKE 24,563.5645986667 UMA 60,303.1821763762 UNI 511,292.129900501 USD 1,122,467,217.65 USDC 55,215,289.1233817 USTC 1,260.54344897418 XTZ 695,291.945724483 YFI 128.160239144428 ZEC 43,919.4737009613 ZRX 2,737,146.67279388†	
Reason: Asserted liabilities are duplicative of Gemini Master Claim.											

†Indicates claim contains unliquidated and/or undetermined amounts

\*Claim was filed after the General Bar Date

Genesis Global Holdco, LLC Case No. 23-10063  
Fifteenth Omnibus Objection  
Exhibit 1 - Gemini Earn Duplicate

CLAIMS TO BE DISALLOWED						SURVIVING CLAIMS					
#	NAME & ADDRESS	CLAIM #	ASSERTED DEBTOR	DATE FILED	TOTAL ASSERTED IN KIND AMOUNT	NAME & ADDRESS	CLAIM #	REMAINING DEBTOR	DATE FILED	TOTAL REMAINING IN KIND AMOUNT	
40	NAME REDACTED ADDRESS REDACTED	1201	Genesis Global Holdco, LLC	11/28/2023*	IINCH 62.885965 BCH 0.43035505 BTC 0.22017522 COMP 1.429504 DOGE 1.436.361806 ETH 0.776401 FIL 12.644258 GRT 179.811863 LINK 13.652222 LTC 1.739825 MANA 40.518233 MKR 0.179551 OXT 142.177292 STORJ 173.573563 ZEC 1.424745†	NAME REDACTED ADDRESS REDACTED	356	Genesis Global Capital, LLC	05/22/23	IINCH 3,012,033.46333801 AAVE 33,788.9425230479 ALCX 8.676.38998201275 AMP 425.936.380.55768 ANKR 23.335.928.0678024 APE 1,139.985.53964617 AXS 90,870.9278787395 BAL 34,868.7609066813 BAT 9,388.882.97197886 BCH 44,121.774231399 BNT 267,993.780189926 BTC 15,094.3806124709 CHZ 688,964.618297403 COMP 14,038.7643541652 CRV 3,110,821.20254412 DAI 8,326,580.27023902 DOGE 195,432.319.002998 ETH 157,019.767022979 FET 2,013,560.72967566 FIL 2,601,610.12844771 FTM 21,093,013.7169699 GRT 17,337,624.765759 GUSD 375,437,385.038869 INJ 135,922.613140235 KNC 434,572.643810026 LINK 1,524,285.66444107 LPT 24,673.1466099058 LRC 2,690,498.81970212 LTC 127,209.281884632 MANA 5,593,977.33440294 MATIC 16,964,467.2401572 MKR 1,338.3803853215 OXT 3,699,739.25944469 PAXG 1,014.97374057132 RBN 25,405.5734626778 REN 4,231,486.62614094 RLY 5,660,470.4301708 SKL 3,980,478.77162429 SNX 237,906.952970567 SOL 284,128.92393429 STORJ 1,811,065.26135581 SUSHI 597,029.850730662 TOKE 24,563.5645986667 UMA 60,303.1821763762 UNI 511,292.129900501 USD 1,122,467.217.65 USDC 55,215,289.1233817 USTC 1,260.54344897418 XTZ 695,291.945724483 YFI 128.160239144428 ZEC 43,919.4737009613 ZRX 2,737,146.67279388†	
Reason: Asserted liabilities are duplicative of Gemini Master Claim.											

Reason: Asserted liabilities are duplicative of Gemini Master Claim.

†Indicates claim contains unliquidated and/or undetermined amounts

\*Claim was filed after the General Bar Date



**EXHIBIT B**

**Kinealy Declaration**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

Genesis Global Holdco, LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No.: 23-10063 (SHL)

Jointly Administered

**DECLARATION OF PAUL KINEALY IN SUPPORT OF DEBTORS’  
FIFTEENTH OMNIBUS OBJECTION (NON-SUBSTANTIVE) TO CERTAIN  
CLAIMS PURSUANT TO 11 U.S.C. § 502 AND FED. R. BANKR. P. 3007 (DUPLICATE)**

I, Paul Kinealy, make this declaration pursuant to 28 U.S.C. § 1746 and state as follows:

**BACKGROUND**

1. I am a Senior Director at Alvarez and Marsal North America, LLC (“A&M”), the financial advisor for the above-captioned Debtors.

2. In my capacity as Senior Director, I am authorized to submit this Declaration in support of the *Debtor’s Fifteenth Omnibus Objection (Non-Substantive) to Certain Claims Pursuant to 11 U.S.C. § 502 and Fed. R. Bankr. P. 3007 (Duplicate)* (the “Objection”).<sup>2</sup>

3. I am familiar with the Debtors’ day-to-day operations, financing arrangements, business affairs, Schedules and Books and Records and am responsible for overseeing the review and analysis of claims filed in the Debtors’ Chapter 11 Cases. All facts set forth herein are based on my personal knowledge, my review or the review of employees of A&M of the Claims and other relevant documents or information provided by the Debtors’ employees and advisors. If I

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<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s tax identification number as applicable), are: Genesis Global Holdco, LLC (8219); Genesis Global Capital, LLC (8564); Genesis Asia Pacific Pte. Ltd. (2164R). For the purpose of these Chapter 11 Cases, the service address for the Debtors is 175 Greenwich Street, Floor 38, New York, NY 10007.

<sup>2</sup> Capitalized terms used, but not otherwise defined, herein shall have the meanings set forth in the Objection.

were called upon to testify, I could and would competently testify to each of the facts set forth herein on that basis, including that I, or employees of A&M, personally reviewed the Disputed Claims (as defined below) identified in Exhibit 1 to the Proposed Order as part of the claims reconciliations process in these Chapter 11 Cases.

### **FACTUAL BASIS OF OBJECTION**

4. I, an A&M employee, or one or more of the Debtors' employees or advisors operating at A&M's direction have reviewed the Claims Register, the Schedules, the Debtors' Books and Records, the Gemini Master Claim and each of the Disputed Claims identified in Exhibit 1 to the Proposed Order and the facts and circumstances set forth in the Objection regarding such Claims.

5. We have also reviewed the information informally provided by Gemini that certain of the Disputed Claims were filed by Gemini Lenders that were participants in the Gemini Earn Program.

6. Based on such review, we have determined that the Disputed Claims are duplicative of a corresponding Gemini Master Claim.

7. Each of the Disputed Claims was identified as a duplicate of the Gemini Master Claim based on one or more of the following factors: the claimant of the Disputed Claim (1) indicated that they were a Gemini Lender and participant in the Gemini Earn Program in their answer to Question 8 on the proof of claim form, (2) indicated in the supporting documentation provided with the proof of claim that they were a Gemini Lender and participant in the Gemini Earn Program, and/or (3) was confirmed by Gemini to be a Gemini Lender and participant in the Gemini Earn Program.

8. We have reviewed each of the Disputed Claims and the supporting documentation for the Disputed Claims and confirmed no other basis aside from their participation in the Gemini Earn Program is asserted as part of the Disputed Claim. We have therefore determined each Disputed Claim is a duplicate of the Gemini Master Claim, which were filed on behalf of all Gemini Earn Program participants.

9. If the Disputed Claims are not disallowed, the claimant may obtain a double recovery for the same alleged liability.

10. The Debtors' advisors will review all incoming discovery productions from Gemini to the Debtors to further confirm the determinations included herein and will make any necessary adjustments to the form of proposed order attached to the Objection to reflect the results of such discovery.

11. I submit that the facts and circumstances set forth in the Objection are true and accurate to the best of my knowledge, information and belief, and the Disputed Claims identified in Exhibit 1 to the Proposed Order should be disallowed in full.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed on December 19, 2023

/s/ Paul Kinealy  
Paul Kinealy